

# **EPA Jacket 85806-4**

# DATA PACKAGE BEAN SHEET

Date: 07-Oct-2015

Page 1 of 2

Decision #: 507395

DP #: (429490)

PRIA

Parent DP #:

Submission #: 971922

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: 85806-4 - AGSAVER DICAMBA TECHNICAL

Company: 85806 - AGSAVER II, LLC

Risk Manager: RM 23 - Kathryn Montague - (703) 305-1243 Room# PY1 S-7332

Risk Manager Reviewer: Karen Samek KSAMEK

Sent Date: \_\_\_\_\_

PRIA Due Date: 19-Apr-2016

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R351) AMENDMENT; UNREGISTERED SOURCE OF ACTIVE INGREDIENT;

Ingredients: 029801, Dicamba(98.9%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 07-Oct-2015

Due Back: \_\_\_\_\_

DP Ingredient: 029801, Dicamba

DP Title: Product Chemistry Review for Reg. No. 85806-4

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

Assigned To

Date In

Date Out

Organization: RD / CITAB

Last Possible Science Due Date: 19-Feb-2016

Team Name: \_\_\_\_\_

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Please provide a 90-day Technical Screen by 11/13/15.

Please review the product chemistry data for this request to add an unregistered source of the active ingredient for Reg. No. 85806-4 and provide a DER/CSF review. The product chemistry data includes MRIDs 49683601, 49683602, 49683603, and 49683604. Attached are copies of the cover letter/transmittal information, label, CSF, and product chemistry data to be reviewed. If you have any questions please contact Karen Samek at 703-347-8825. Thanks.

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1550/Product Identity and composition	Pass (17-Aug-2015)
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1600/Description of materials used to produce the product	Pass (17-Aug-2015)
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1620/Description of production process	Pass (17-Aug-2015)
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1670/Discussion of formation of impurities	Pass (17-Aug-2015)
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1750/Certified limits	Pass (17-Aug-2015)
49683601		Butz, R. (2015) AgSaver(TM) Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits, Analytical Method. Project Number: 201501, W0276761/3. Unpublished study prepared by AgSaver II, LLC. 71p.	830.1800/Enforcement analytical method	Pass (17-Aug-2015)
49683602		Sun, G. (2009) Preliminary Analysis of Dicamba Technical Grade Active Ingredient: Final Report. Project Number: 01/14863/02/001, GLP/SP/064. Unpublished study prepared by Southwest Research Institute. 40p.	830.1700/Preliminary analysis	Pass (17-Aug-2015)
49683602		Sun, G. (2009) Preliminary Analysis of Dicamba Technical Grade Active Ingredient: Final Report. Project Number: 01/14863/02/001, GLP/SP/064. Unpublished study prepared by Southwest Research Institute. 40p.	830.1800/Enforcement analytical method	Pass (17-Aug-2015)
49683603		Sun, G. (2015) Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans Analysis of Dicamba TGA: Final Report. Project Number: 01/14863/02/003, GLP/SP/066, 090521/1. Unpublished study prepared by Southwest Research Institute. 99p.	830.1700/Preliminary analysis	Pass (17-Aug-2015)
49683603		Sun, G. (2015) Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans Analysis of Dicamba TGA: Final Report. Project Number: 01/14863/02/003, GLP/SP/066, 090521/1. Unpublished study prepared by Southwest Research Institute. 99p.	830.1800/Enforcement analytical method	Pass (17-Aug-2015)

DP#: (429490)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (507395)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6302/Color	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6303/Physical state	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6304/Odor	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6313/Stability to normal and elevated temperatures, metals, and metal ions	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6314/Oxidizing or reducing action	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6317/Storage stability	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.6320/Corrosion characteristics	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.7000/pH	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.7050/UV/Visible absorption	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.7200/Melting point/melting range	Pass (17-Aug-2015)
49683604		Miller, R. (2013) Physical and Chemical Characteristics of Dicamba 98%: Final Report. Project Number: ARC/EX/1365, ARC/EX/1365/017/P/1, ARC/EX/1365/001/P. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 72p.	830.7300/Density/relative density	Pass (17-Aug-2015)



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## DATA MATRIX

Date: <b>July 28, 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 1 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Product Properties				
830.1550	Product Identity and Composition	Volume 2 49273301	AgSaver II, LLC AgSaver II, LLC	OWN OWN	
830.1600	Description of materials used to produce the product	Volume 2 49273301	AgSaver II, LLC AgSaver II, LLC	OWN OWN	
830.1620	Description of production process	Volume 2 49273301	AgSaver II, LLC AgSaver II, LLC	OWN OWN	
830.1670	Formation of Impurities	Volume 2 49273301	AgSaver II, LLC AgSaver II, LLC	OWN OWN	
830.1700	Preliminary Analysis	Volume 2 49273302 49565101	AgSaver II, LLC AgSaver II, LLC AgSaver II, LLC	OWN OWN OWN	
830.1750	Certification of Limits	Volume 2 49273301	AgSaver II, LLC AgSaver II, LLC	OWN OWN	
830.1800	Analytical Method	Volume 2 Volume 3 Volume 4 49273302	AgSaver II, LLC AgSaver II, LLC AgSaver II, LLC AgSaver II, LLC	OWN OWN OWN OWN	

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worchester LLP	Date 7/28/2015
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		49565101	AgSaver II, LLC	OWN	
830.6302	Color	49273303	AgSaver II, LLC	OWN	
830.6303	Physical State	49273303	AgSaver II, LLC	OWN	
830.6304	Odor	49273303	AgSaver II, LLC	OWN	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	49273303	AgSaver II, LLC	OWN	
830.6314	Oxidation/reduction: Chemical Incompatibility	49273303	AgSaver II, LLC	OWN	
830.6315	Flammability	N/A	AgSaver II, LLC	N/A	N/A per 830.1000
830.6316	Explosibility	N/A	AgSaver II, LLC	N/A	N/A per 830.1000
830.6320	Corrosion Characteristics	49273303	AgSaver II, LLC	OWN	
830.6376	Storage Stability	49273303	AgSaver II, LLC	OWN	
830.7000	pH	49273303	AgSaver II, LLC	OWN	
830.7050	UV/Visible Absorption	49273303	AgSaver II, LLC AgSaver II, LLC	OWN OWN	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worchester LLP	Date 7/28/2015
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting Point	49273303	AgSaver II, LLC	OWN	
830.7300	Density	49273303	AgSaver II, LLC	OWN	
830.7370	Dissociation Constants in Water	43288001, 43140308, 44520902	SANDOZ AGRO INC, SANDOZ AGRO INC ALBAUGH INC	OLD OLD OLD	
830.7550	Partition coefficient, shake flask method	41966601 23106	SANDOZ AGRO INC VELSICOL CHEMICAL CORP	OLD OLD	
830.7570	Octanol/Water Partition	44520902	ALBAUGH INC	OLD	
830.7840	Solubility	23106, 44520902	VELSICOL CHEMICAL CORP ALBAUGH INC	OLD OLD	
830.7950	Vapor Pressure	23106	VELSICOL CHEMICAL CORP	OLD	
	<b>Fate, Transport and Transformation.</b>				
835.1240	Leaching/Adsorption/Desorption	42774101, 43095301	Sandoz Agro, Inc. Sandoz Agro, Inc.	OLD OLD	
835.1410	Laboratory Volatilization	41966602	Sandoz Crop Prot. Corp.	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.2120	Hydrolysis	40335501	Velsicol Chemical Corporation,	OLD	
835.2240	Photodegradation - Water	42774103	Sandoz Agro, Inc	OLD	
835.2410	Photodegradation - Soil	42774103	Sandoz Agro, Inc	OLD	
835.4100	Aerobic Soil Metabolism	43245207	Sandoz Agro. Inc	OLD	
835.4200	Anaerobic Soil Metabolism	43245208	Sandoz Agro. Inc	OLD	
835.4300	Aerobic Aquatic Metabolism	43758509	Sandoz Agro. Inc	OLD	
835.4400	Anaerobic Aquatic Metabolism	43245208	Sandoz Agro. Inc	OLD	
835.6100	Terrestrial Field Dissipation	42754101, 42754102, 44361526	Sandoz Agro, Inc. Sandoz Agro, Inc. UNKNOWN	OLD OLD OLD	
835.8100	Fate in Soil - Leaching & Adsorption/Desorption	48876002 47434312	MONSANTO U.S. EPA	PL PL	
	<b>Spray Drift</b>				
840.1100	Spray Droplet Size Spectrum	Cite-all	Spray Drift Task Force	PAY	

Signature:

Name and Title

Robert G. Butz,  
Authorized Agent for AgSaver II, LLC  
Sullivan & Worcester LLP

Date

7/28/2015





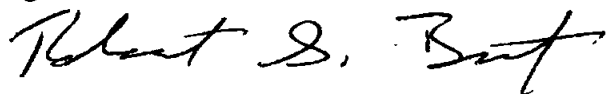
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Date: <b>July 28, 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 5 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
840.1200	Spray Drift Field Deposition	Cite-all	Spray Drift Task Force	PAY	
	Ecological Effects				
850.1010	Freshwater Invertebrate Toxicity	00052126	VELSICOL CHEMICAL CORP	OLD	
850.1010	Invertebrate Toxicity - TEP	40094602	U.S. FISH & WILDLIFE	PL	
850.1025	Estuarine/Marine Toxicity - Mollusk	40228401	U.S. EPA	OLD	
850.1035	Estuarine/Marine Toxicity - Shrimp	00034702	VELSICOL CHEMICAL CORP	OLD	
850.1075	Fish Toxicity Bluegill	00034703	VELSICOL CHEMICAL CORP	OLD	
850.1075	Fish Toxicity Bluegill — TEP	40098001	US Fish & Wildlife Service	PL	
850.1075	Freshwater Fish Toxicity Rainbow Trout	00041272	VELSICOL CHEMICAL CORP	OLD	
850.1075	Freshwater Fish Toxicity Rainbow Trout - TEP	00036915	VELSICOL CHEMICAL CORP	OLD	
850.1075	Estuarine/Marine Toxicity - Fish	00025390 45205107	VELSICOL CHEMICAL CORP U.S. EPA	OLD PL	
850.2100	Avian Acute Oral Toxicity-Duck	42774106	SANDOZ AGRO INC	OLD OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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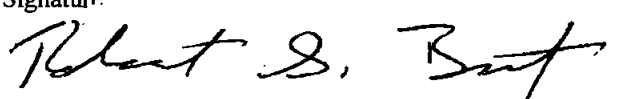
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2100	Avian Acute Oral Toxicity-Quail	42774105	SANDOZ AGRO INC	OLD	
850.2300	Avian Reproduction - Quail	43814004	SANDOZ AGRO INC	OLD	
850.2300	Avian Reproduction — Duck	43814003	SANDOZ AGRO INC	OLD	
850.3020	Honey Bee Acute Contact	00036935	ENIMONT AMERICA, INC	OLD	
850.4100	Seedling Germination and Seedling Emergence, Tier I	42846301	SANDOZ AGRO INC	OLD	
850.4150	Vegetative Vigor, Tier I	42846301	SANDOZ AGRO INC	OLD	
850.4200	Effects on Non-Target Plants - Seed Germination & Vegetative Vigor	48718014	BASF CORPORATION	PAY	
850.4225	Seedling Germination and Seedling Emergence, Tier II	48001301	BASF CORPORATION	PAY	
850.4250	Vegetative Vigor, Tier II	48001302	BASF CORPORATION	PAY	
850.4400	Aquatic Plant Toxicity testing using <i>Lemna</i> , sp.	45088212	U.S. EPA	PL	
850.5400	Aquatic Plant Growth	42774107, 42774108,	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worchester LLP	Date 7/28/2015
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		42774109, 42774100, 42774110	SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD OLD	
	Residue Chemistry				
860.1300	Nature of Residue — Plants	40642801	SANDOZ AGRAO INC	OLD	
860.1300	Nature of Residue — Livestock	43461701	WELLMARK INTERNATIONAL	OLD	
860.1340	Residue Analytical Method — Plants	40233501, 40547911, 41187301, 42675901, 42883202, 43245203, 43245205, 43245205, 43245206, 43274501, 43370701,	SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC WELLMARK INTERNATIONAL	OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		43425803, 43866601, 43814101, 44089302, 44089303, 44089304, 44089305, 44891302, 44891303, 45196801, 43814001, 48001303	SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC BASF CORPORATION BASF CORPORATION BASF CORPORATION SANDOZ AGRO INC BASF CORP	OLD OLD OLD OLD OLD OLD OLD OLD PAY PAY PAY OLD PAY	
860.1340	Residue Analytical Method - Livestock	Data gap		GAP	RED
860.1360	Multiresidue Methods	48001304	BASF CORP	PAY	
860.1380	Storage Stability- sugarcane molasses	Data gap		GAP	RED
860.1380	Storage Stability- animal commodities	Data gap		GAP	RED
860.1480	MCR - Cattle, Goats, Horses and Sheep Meat	00079742	VELSICOL CHEMICAL CORP	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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401 M Street, S.W.  
WASHINGTON, D.C. 20460

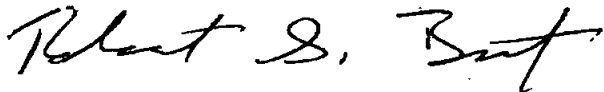
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**DATA MATRIX**

Date: <b>July 28, 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 9 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>		Product: <b>AgSaver Dicamba Technical</b>
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	MOR - Cattle, Goats, Horses and Sheep Meat Byproducts	00079742	VELSICOL CHEMICAL CORP	OLD	
860.1480	MOR - Cattle, Goats, Horses and Sheep Fat	00079742	VELSICOL CHEMICAL CORP	OLD	
860.1480	MOR - Milk	00116671	VELSICOL CHEMICAL COR	OLD	
860.1500	MOR - Corn, Grain	44089303	SANDOZ AGRO INC	OLD	
860.1500	MOR - Corn, Stover	44089303	SANDOZ AGRO INC	OLD	
860.1500	MOR - Corn, Sweet	48001305	BASF CORPORATION	PAY	
860.1500	Corn, Forage	44089303	SANDOZ AGRO INC	OLD	
860.1500	MOR - Soybean, forage	40001901 41387001	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1500	MOR - Soybean, hay	40001901 41387001	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1500	MOR - Sugarcane	00030701 44089302	VELSICOL CHEMICAL CORP SANDOZ AGRO INC	OLD OLD	
860.1500	MOR - Sorghum, Grain	43245203	SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worchester LLP	Date 7/28/2015
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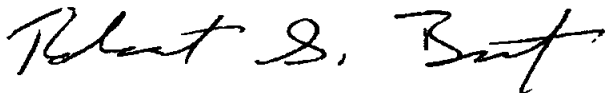
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	MOR -Sorghum, Stover	44089306	SANDOZ AGRO INC	OLD	
860.1500	MOR - Sorghum, Forage	43245203	SANDOZ AGRO INC	OLD	
860.1500	MOR - Stalk, Stem, and Leaf Petiole Vegetables	48499801	INTERREGIONAL RESEARCH PROJECT NO. 4 (IR-4)	PL	
860.1500	MOR - Wheat, Grain	44089305	SANDOZ AGRO INC	OLD	
860.1500	MOR - Wheat, Forage	43274501	SANDOZ AGRO INC	OLD	
860.1500	MOR - Wheat, Straw	44089305	SANDOZ AGRO INC	OLD	
860.1520	Magnitude of Residue in Processed Food/Feed; Wheat	40663801, 42675901	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1560	Reasonable Grounds in Support of Petition - Exposure or Risk to Non-Target Organisms	48457909	U.S. EPA	PL	
860.1850	Confined Accumulation in Rotational Crops	41972001, 43698601	SANDOZ WELLMARK INTERNATIONAL	OLD OLD	
	<b>Health Effects</b>				
870.1100	Acute Oral Toxicity	00078444	VELSICOL CHEMICAL CORP	OLD	RED

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC</b> <b>203 E. Ash Ave.</b> <b>McGehee, AR 71654</b>		Product:  <b>AgSaver Dicamba Technical</b>
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200	Acute Dermal Toxicity	00241584	UNKNOWN	OLD	RED
870.1300	Acute Inhalation Toxicity	00263861	UNKNOWN	OLD	RED
870.2400	Acute Eye Irritation	00241584	UNKNOWN	OLD	RED
870.2500	Acute Dermal Irritation	00237955	UNKNOWN	OLD	RED
870.2600	Dermal Sensitization	00263861	UNKNOWN	OLD	RED
870.3100	Subchronic Oral Toxicity: 90- Day Study Rodent	44623101	BASF CORPORATION	OLD	
870.3150	Subchronic Oral Toxicity: 90- Day Study Non-rodent	44623101	BASF CORPORATION	OLD	
870.3200	21-Day Dermal - Rabbit/Rat	40547901, 45814501	SANDOZ AGRO INC BASF CORPORATION	OLD OLD	
870.3550	Developmental Toxicity - Mice	46074401	U.S. EPA	PL	
870.3700	Developmental Toxicity - Rat	00084024	Velsicol Chemical Corp.	OLD	
870.3700	Developmental Toxicity - Rabbit	42429401	SANDOZ AGRO INC	OLD	
870.3800	2-Generation Reproduction - Rat	43137101	SANDOZ AGRO INC	OLD	

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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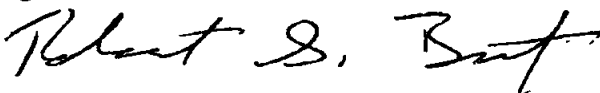
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4100	Chronic Feeding Toxicity - Rat	42774104	SANDOZ AGRO INC	OLD	
870.4100	Chronic Feeding Toxicity Study - Rat	00145150	E. I. DUPONT DE NEMOURS	OLD	
870.4100	Chronic Feeding Toxicity Study - Non-rodent	40321102, 43245210	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
870.4200	Carcinogenicity Mice	40872401	SANDOZ AGRO INC	OLD	
870.4300	Combined Chronic Toxicity/Carcinogenicity: Rats	00145150	E. I. DUPONT DE NEMOURS	OLD	
870.5100	Bacterial Reverse Gene Mutation	40321101	SANDOZ AGRO INC	OLD	
870.5375	Cytogenetics	40321101, 00143001	SANDOZ AGRO INC VELSICOL CHEMICAL CORP	OLD OLD	
870.5550	Unscheduled DNA Synthesis in Mammalian Cells in Culture	00143001	VELSICOL CHEMICAL CORP	OLD	
870.7485	General Metabolism	44609801	BASF CORPORATION	OLD	
870.7800	Immunotoxicity	48081601	BASF CORP	PAY	
	Occupational and Residential Exposure				

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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EPA Form 8570-35 (9-97) Elec.ronic and Paper versions available. Submit only Paper version.

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Agency Use Copy





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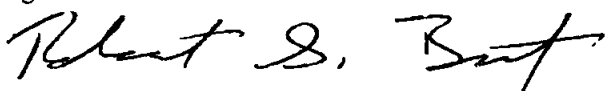
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1000	Background for Application Exposure Monitoring	Cite-All	AHETF	PAY	
875.1100	Dermal Exposure -Outdoor	Cite-All	AHETF	PAY	
875.1200	Dermal Exposure - Indoor	Cite-All	ARTF, AHETF	PAY	
875.1300	Inhalation Exposure -Outdoor	Cite-All	ARTF, AHETF	PAY	
875.1400	Inhalation Exposure -Indoor	47464517	U.S. EPA	PL	
875.2100	Foliar Dislodgeable Residue Dissipation	Cite-All	ARTF	PAY	
875.2200	Soil Residue Dissipation	44959001 47299308	SYNGENTA CROP PROTECTION, LLC U.S. EPA	PAY PL	RED <sup>1</sup>
875.2400	Dermal Exposure - Postapplication	Cite-All	ARTF	PAY	
875.2500	Inhalation Exposure - Postapplication	Cite-All	ARTF	PAY	
Special	Exposure or Risk to Non-Target organisms	Cite-All	Generic Endangered Species Task Force	PAY	

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worchester LLP	Date 7/28/2015
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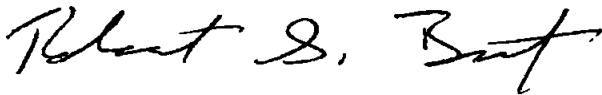
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Ingredient: <b>Dicamba</b>		

**End Notes**

1. This study is classified as an 875.2200 study in the Dicamba RED, but in NPIRS appears as an 875.2100 study. The study title also indicates it is probably an 875.2100 study.

**AgSaver II, LLC will make offers-to-pay to the following entities on the Data Submitters List of July 1, 2015:**

1. AGRICULTURAL HANDLER EXPOSURE TASK FORCE
2. AGRICULTURAL REENTRY TASK FORCE
3. BASF CORPORATION
4. GENERIC ENDANGERED SPECIES TASK FORCE
5. SPRAY DRIFT TASK FORCE
6. SYNGENTA CROP PROTECTION, LLC

Signature: 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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## AgSaver™ Dicamba Technical FOR MANUFACTURING PURPOSES ONLY

Formulators who use this product are responsible for obtaining EPA registration for their formulated products.

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-o-anisic acid) ..... 98.9%

**OTHER INGREDIENTS:** ..... 1.1%

**TOTAL** 100.0%

### KEEP OUT OF REACH OF CHILDREN DANGER

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage.	

See page [back] [side] [panel] [next page] for Directions for Use and for additional precautionary statements.

EPA Reg. No. 85806-4

NET CONTENTS: \_\_\_\_\_

EPA Est. No. \_\_\_\_\_

[Batch Code: to appear on label or container]

MANUFACTURED FOR:  
AgSaver™ II, LLC  
203 East Ash Street • McGehee, AR 71654

## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your local State Water Board or Regional Office of the EPA.

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, teff, wheat), sorghum (including Sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms; (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

## **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

### **Container Disposal: [[Nonrefillable Inner Liner]**

**Liner:** Nonrefillable container. Do not reuse or refill this bag. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.] [and/or]

### **[[Non-refillable Exterior Container]**

**[Exterior Bag:] [OR] [Exterior Drum:]** [Nonrefillable container. Do not reuse or refill this container. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.]] [and/ or]

### **[[Refillable Exterior Container]**

**[Exterior Bag:] [OR] [Exterior Drum:]** [Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. If container is contaminated or damaged, it cannot be reused. Completely empty container into equipment. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures. Emptying the container before final disposal is the responsibility of the person disposing of the container.]

## **CONDITIONS OF SALE AND LIMITATION OF WARRANTY**

Seller warrants that this product conforms with its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent permitted by applicable law buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable law, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

<b>Explore Registrations</b> <div style="float: right; text-align: right;"> <input type="button" value="Home"/> <input type="button" value="Back"/> <input type="button" value="Close"/> </div>				
<b>Reg Number:</b> 85806-4		<b>Reg. Type:</b> Product Registration - Section 3		<b>Status:</b> Registered (30-Mar-2015)
<b>Name:</b> AGSAVER DICAMBA TECHNICAL			<input type="button" value="View Registration Details"/>	
<b>(No New Receipts)</b>				
S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div style="display: flex; border: 1px solid black;"> <div style="width: 40%; border-right: 1px solid black; padding: 5px;"> <div> <div>Decisions...</div> <div> <div>Data Requirements</div> <div> <div>D: Pending; 507395; 85806-4; R351; AMENDMENT</div> <div>75-Day Letters</div> <div style="background-color: black; color: white; padding: 2px;">S: 971922 7/29/2015; Amendment; 85806</div> <div>D: Closed; 485797; 85806-4; R334; NEW PRODUCT</div> </div> </div> </div> <div style="width: 60%; padding: 5px;"> <div style="text-align: right; margin-bottom: 10px;"> S: 971922    Reg #: 85806-4 </div> <div> <div>Submission Type: Amendment</div> <div>Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No      E-Sub #:</div> <div>Decision #: 507395; R351; AMENDMENT; UNREGISTERED SOURCE OF AC</div> <div>Submitter Company: AGSAVER II, LLC</div> <div>Application Date: 29-Jul-2015</div> <div>OPP Received Date: 29-Jul-2015      Date Sent to Risk manager: 30-Jul-2015</div> <div>Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No      Fast Track?: <input type="radio"/> Yes <input checked="" type="radio"/> No</div> <div>Form A Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date:</div> <div>Form B Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date:</div> <div>Reviewer: Samek, Karen</div> <div>Received DT:      Editable Due DT:</div> <div>Submission Due DT: 19-Apr-2016    Response: 0, 29-Jul-2015</div> <div>Priority Weight:      Priority Points:</div> <div>Comments: To add new unregistered source of A.I./ Submission includes product chemistry</div> </div> </div> </div></div>				

AUG 26 2015

**Herbicide Branch Assignment Sheet**

Date Delivered to PM

8/25/15  
(date & initial) *PS***Product Managers**Kathryn Montague  
PM 23Reuben Baris  
PM 25**Risk Managers**

Beth

Shanta

Emily

Sarah

Grant

Mindy

Juanita

Terri

Karen

Deirdre

Dianne

Dominic

*Comments to Summer/Eleanor* \_\_\_\_\_*Comments to Risk Manager* R351*Date to Summer / Eleanor*

(date &amp; initial)

*KM 8/25/15*

Process History





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

August 06, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

SULLIVAN & WORCESTER LLP  
AGSAVER II, LLC  
1666 K STREET, NW SUITE 700  
WASHINGTON, DC 20006

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 29-JUL-15. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3			
S:	971922	Milestone Email:	
Regulatory Type:	Product Registration - Section 3	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Application Type:	Amendment	Fee For Service:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Company:	85806 AGSAVER II, LLC	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Risk Manager:	Registration Division, Risk Management Team 23		
Product #:	85806-4	Product Name:	AGSAVER DICAMBA TECHNICAL
Override:			
Me Too Section 3:	42750-57	Me Too Product Name:	ALBAUGH TECHNICAL DICAMBAACID
Application Date:	29-Jul-2015	OPP Rec'd Date:	29-Jul-2015
Front End Date:	30-Jul-2015	Risk Manager Send Date:	
FFS Due Date:		Negotiated Due Date:	
OPP Target Date:			
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>
Receipt Description:		View/Edit	
Amendment to add a new unregistered source of active ingredient.		New Ingredient Request Date:	
		New Ingredient Received Date:	
Form A:	<input type="checkbox"/>	Signature Date:	
Form B:	<input type="checkbox"/>	Signature Date:	

Print Letter

Enter More Information

Tracking

Study

CSF

July 29, 2015

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

Document Processing Desk (REGFEE)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard Room S-4900  
2777 S. Crystal Drive  
Arlington, VA 22202

ATTN: Kathryn Montague, Product Manager #23

Re: Amendment to add a new unregistered source of active ingredient for AgSaver™ Dicamba Technical, EPA Reg. No. 85806-4

Dear Ms. Montague:

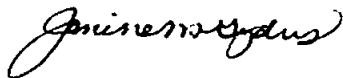
On behalf of AGSAVER II, LLC, we are submitting an Amendment to add a new unregistered source of active ingredient for AgSaver™ Dicamba Technical, EPA Reg. No. 85806-4. This action falls under R351.

Please find attached:

1. Transmittal Document
2. Application Form (EPA Form 8570-1)
3. Confidential Statement of Formula, Alternate Formulation #1, dated 7/28/2015
4. Certification with Respect to Citation of Data, dated 7/28/2015 (Form 8570-34)
5. Data Matrix, dated 7/28/2015 (EPA Form 8570-35, Agency and Public Use)
6. Copy of label (Label Code: ESL20150330 FPL20150620; W0277280)
7. 3 copies each of the study reports
8. A copy of the PRIA fee email receipt

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



Janine Gydus  
[jgydus@sandw.com](mailto:jgydus@sandw.com)  
202-775-1235

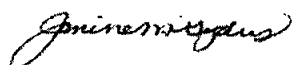
Enclosures

cc: Telisport W Putsavage, Sullivan & Worcester  
Clarke Pugh, AgSaver II, LLC

## TRANSMITTAL DOCUMENT

**Submitter:**  
 AgSaver II, LLC  
 203 East Ash Street  
 McGehee, AR 71654

EPA Company Number 85806

**Company Contact:**


Janine M. Gydus, Staff Scientist/Authorized Agent  
 Sullivan & Worcester LLP  
 1666 K St. NW, Suite 700, Washington, DC 20006  
 Phone: 202-775-1235 Email Address: jgydus@sandw.com

**Regulatory Action in Support of Which this Package is Submitted:**

Amendment to add source of active ingredient to AgSaver Dicamba Technical (85806-4)

**Submission Date:**

7/29/2015

**List of Submitted Documents:**

	Description	MRID
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Volume 2	Butz, R. 2015. AgSaver Dicamba Technical: Product Identity and Composition, Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities, Certified Limits and Analytical Method. OCSPP 830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1800. 71 pages.	49683601
Volume 3	Sun, G. 2009. Preliminary Analysis of Dicamba Technical Grade Active Ingredient. OCSPP 830.1700 & 830.1800. 48 pages.	49683602
Volume 4	Sun, G. 2015. Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans Analysis of Dicamba Technical Grade Active Ingredient. OCSPP 830.1700 & 830.1800. 123 pages.	49683603
Volume 5	Miller, R. 2013. Physical and Chemical Characteristics of Dicamba 98%. OCSPP 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6317, 830.6320, 830.7000, 830.7050, 830.7200 & 830.7300. 72 pages.	49683604

## Memorandum

Date: 8 / 12 / 2015

To: 23, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission

Waiting for date  
AB 8/13/15

**21-Day Screen of Amendment**  
**(Completed by Contractor)**

21-day Expires on 8/19/15

Document Part Of: 85806-4  
MRID, If Any: 496836

Content Screen: Recommended to  
Pass/Fail

11-3 Review: Passed/Failed/NA

Overall Status: Pass/Fail

Document returned to:

Steve Schaible

# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 7/29/15

Experts In-Processing Signature: MP

Date 7/30/15

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>85806-4</u>		EPA Receipt Date: <u>7/29/15</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A) <u>N/A Tech 2 impurities</u>	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	X	no			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

**Comments:**

Documentation: Pass

The public matrix is missing.

The registrant insists that the public matrix was included w/ the original submission. This is not the 1st time this comment has been made by a registrant. It seems that jackets are consistently being given to analysts to review w/ the public matrix removed.

The registrant provided a new copy of the missing public via email.

Inerts: N/A

Technical & impurities only, no inerts to review

IL-3: Pass

MRID 496836

Status: Pass

KC 8/12/2015



\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

**Script for Rejection Phone calls**

**Contact Name:** Janine Gydus  
**Phone #:** 202-775-1235  
**Email:** jgydus@sandw.com

**First Call/Initials:** KC

**Date:** 8/12/2015

**Time:** 11:26 AM

**Second Call/Initials:**

**Date:**

**Time:**

**This is \_\_\_\_\_, EPA contractor.**

**I'm calling regarding your submission in support of**  
Ag-Save- Dicamba Technical (85806-4)

**We have found the following deficiencies regarding:**

**PR Notice 2011-3: Yes or No**

**Volume/Study Title:**

**Volume/Study Title:**

**Volume/Study Title:**

**Additional volumes continued on back of page: Yes or No**

**Application Package: Yes or No**

The public data matrix is missing (corrections rec'd 8/12/2015)

**These deficiencies have been approved by EPA.**

**The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_.**

**Second Call/Email:**

**If we do not receive the corrections by \_\_\_\_\_, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.**



# Receipt for Section 3

S: 971922

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☒ Yes ☐ No

Company: 85806 AGSAVER II, LLC



Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 23

Product #: 85806-4

Product Name: AGSAVER DICAMBA TECHNICAL

Override#:

Me Too  
Section3: 42750-57

Me Too Product  
Name: ALBAUGH TECHNICAL DICAMBAACID

Application Date: 29-Jul-2015

OPP Rec'd Date: 29-Jul-2015

Front End Date: 30-Jul-2015

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Amendment to add a new unregistered source of active ingredient.

Receipt Content

Study

CSF

View/Edit

Form A: ☐

Signature Date:

Form B: ☐


New Ingredient

Request Date:

New Ingredient

Received Date:

Signature Date:

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input checked="" type="checkbox"/> Amendment	
	Washington, DC 20460	<input type="checkbox"/> Other	

**Application for Pesticide – Section I**

1. Company/Product Number EPA File Symbol: 85806-4	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AgSaver™ Dicamba Technical	PM # 23	
5. Name and Address of Applicant (Include ZIP Code) AGSAVER II, LLC P. O. Box 111 MCGEHEE, AR 71654 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. Product Name	

**Section – II**

<input checked="" type="checkbox"/> Amendment – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Other – Explain below

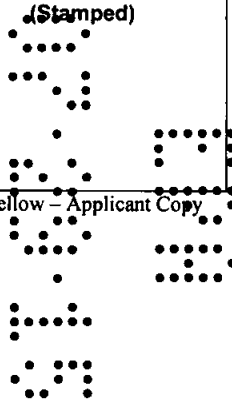
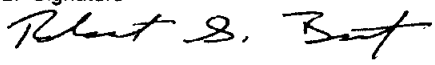
**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.) Amendment to add a new unregistered source of active ingredient  
This action is PRIA Category R351

Point of Contact: Robert Butz rbutz@sandw.com 202-775-1211

**Section III**

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other Pouch			

**Section IV**

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robert G. Butz	Title Staff Scientist Sullivan & Worcester LLP Authorized Agent for AgSaver II, LLC	Telephone No. (Include Area Code) 202-775-1211
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		6. Date Application Received  
2. Signature 	3. Title Staff Scientist, Sullivan & Worcester LLP Authorized Agent for AgSaver II, LLC	
4. Typed Name Robert G. Butz	5. Date 7/29/ 2015	

July 29, 2015

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

Document Processing Desk (REGFEE)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard Room S-4900  
2777 S. Crystal Drive  
Arlington, VA 22202

ATTN: Kathryn Montague, Product Manager #23

Re: Amendment to add a new unregistered source of active ingredient for AgSaver™ Dicamba Technical, EPA Reg. No. 85806-4

Dear Ms. Montague:

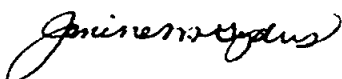
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7. 3 copies each of the study reports
8. A copy of the PRIA fee email receipt

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



Janine Gydu  
[jgydu@sandw.com](mailto:jgydu@sandw.com)  
202-775-1235

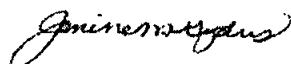
Enclosures

cc: Telisport W Putsavage, Sullivan & Worcester  
Clarke Pugh, AgSaver II, LLC

## TRANSMITTAL DOCUMENT

**Submitter:**  
 AgSaver II, LLC  
 203 East Ash Street  
 McGehee, AR 71654

EPA Company Number 85806

**Company Contact:**


Janine M. Gydus, Staff Scientist/Authorized Agent  
 Sullivan & Worcester LLP  
 1666 K St. NW, Suite 700, Washington, DC 20006  
 Phone: 202-775-1235 Email Address: jgydus@sandw.com

**Regulatory Action in Support of Which this Package is Submitted:**

Amendment to add source of active ingredient to AgSaver Dicamba Technical (85806-4)

**Submission Date:**

7/29/2015

**List of Submitted Documents:**

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number

**AGSAVER II, LLC**  
**203 EAST ASH STREET**  
**MCGEEHEE AR 71654**

EPA Registration Number/File Symbol  
**85806-4**

Active Ingredient(s) and/or representative test compound(s)  
**Dicamba, CAS Reg. No. 1918-00-9**

Date **July 28, 2015**

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)  
**Terrestrial Food Crop; Terrestrial Nonfood Crop, Terrestrial Noncrop uses for which US EPA has accepted required data and/or citations of data in support of registration; and uses for experimental purposes in compliance with US EPA.**

Product Name  
**AgSaver Dicamba Technical**

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulators Exemption Statement (EPA Form 8570-27)

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose)

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method, or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section 1, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitted to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment of both under applicable law.

Signature

*Clarke Pugh*

Date

7/28/2015

Typed or Printed Name and Title  
 Clarke Pugh,  
 Member, AgSaver II, LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

July 30, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-507395  
EPA File Symbol or Registration Number: 85806-4  
Product Name: AGSAVER DICAMBA TECHNICAL  
EPA Receipt Date: 29-Jul-2015  
EPA Company Number: 85806  
Company Name: AGSAVER II, LLC

ROBERT G. BUTZ, PH.D.  
SULLIVAN & WORCESTER LLP  
AGSAVER II, LLC  
1666 K STREET, NW SUITE 700  
WASHINGTON, DC 20006-

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R351

AMENDMENT; UNREGISTERED SOURCE OF ACTIVE INGREDIENT;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

*Teresa Downs*  
Front End Processing Staff

Information Technology & Resources Management Division

**Fee for Service**

10  
{971922(~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☒ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.      **23**

Receipt No.

S- **971922**

EPA File Symbol/Reg. No.

**85806-4**

Pin-Punch Date:

**7/29/2015**

☐ This item is NOT subject to FFS action.

Action Code:

Requested: **R351**

Granted: **R 351**

Amount Due: \$ **12,596**

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: **Nayam K. Muhammed**

Date: **7/30/15**

Remarks:

**Butz, Ph.D., Robert G.**

---

**From:** Clarke Pugh <clarkepugh@yahoo.com>  
**Sent:** Monday, June 22, 2015 1:07 PM  
**To:** Butz, Ph.D., Robert G.  
**Subject:** Fw: Pay.gov Payment Confirmation: PRIA Service Fees

----- Forwarded Message -----

**From:** "notification@pay.gov" <notification@pay.gov>  
**To:** [clarkepugh@yahoo.com](mailto:clarkepugh@yahoo.com)  
**Sent:** Monday, June 22, 2015 12:06 PM  
**Subject:** Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or [yanchulis.michael@epa.gov](mailto:yanchulis.michael@epa.gov).

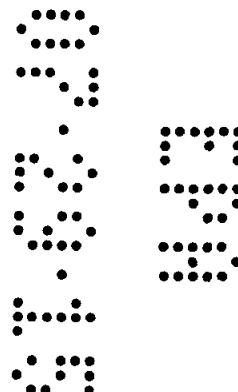
Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 25LV7DRN  
Agency Tracking ID: 74825588361  
Transaction Type: Sale  
Transaction Date: 06/22/2015 01:06:12 PM EDT

Account Holder Name: Clarke Pugh

Transaction Amount: \$12,596.00  
Billing Address: PO Box 121  
City: McGehee  
State/Province: AR  
Zip/Postal Code: 71654  
Country: USA  
Card Type: AmericanExpress  
Card Number: \*\*\*\*\*7008

Registration Number: 85806-4  
Company Name: AgSaver, LLC  
Company Number: 85806  
Action Code: R351

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





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Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

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## DATA MATRIX

Date: <b>July 28 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 1 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	N/A	N/A per 830.1000
			AgSaver II, LLC	N/A	N/A per 830.1000
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			AgSaver II, LLC	OWN	
			AgSaver II, LLC	OWN	
			SANDOZ AGRO INC, SANDOZ AGRO INC ALBAUGH INC	OLD OLD OLD	
			SANDOZ AGRO INC VELSICOL CHEMICAL CORP	OLD OLD	
			ALBAUGH INC	OLD	
			VELSICOL CHEMICAL CORP ALBAUGH INC	OLD OLD	
			VELSICOL CHEMICAL CORP	OLD	
			Sandoz Agro, Inc. Sandoz Agro, Inc.	OLD OLD	
			Sandoz Crop Prot. Corp.	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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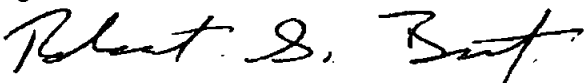
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Velsicol Chemical Corporation,	OLD	
			Sandoz Agro, Inc	OLD	
			Sandoz Agro, Inc	OLD	
			Sandoz Agro. Inc	OLD	
			Sandoz Agro. Inc	OLD	
			Sandoz Agro. Inc	OLD	
			Sandoz Agro. Inc	OLD	
			Sandoz Agro. Inc	OLD	
			Sandoz Agro, Inc. Sandoz Agro, Inc. UNKNOWN	OLD OLD OLD	
			MONSANTO U.S. EPA	PL PL	
			Spray Drift Task Force	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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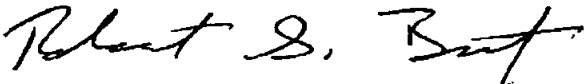
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force	PAY	
			VELSICOL CHEMICAL CORP	OLD	
			U.S. FISH & WILDLIFE	PL	
			U.S. EPA	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			US Fish & Wildlife Service	PL	
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			U.S. EPA	PL	
			SANDOZ AGRO INC	OLD OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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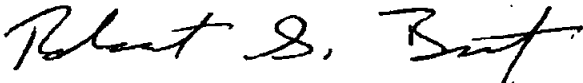
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			ENIMONT AMERICA, INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			BASF CORPORATION	PAY	
			BASF CORPORATION	PAY	
			BASF CORPORATION	PAY	
			U.S. EPA	PL.	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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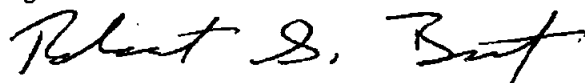
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRAO INC	OLD	
			WELLMARK INTERNATIONAL	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			WELLMARK INTERNATIONAL	OLD	
Signature 			Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP		Date 7/28/2015



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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			BASF CORPORATION	PAY	
			BASF CORPORATION	PAY	
			BASF CORPORATION	PAY	
			SANDOZ AGRO INC	OLD	
			BASF CORP	PAY	
				GAP	RED
			BASF CORP	PAY	
				GAP	
				GAP	
				GAP	
			VELSICOL CHEMICAL CORP	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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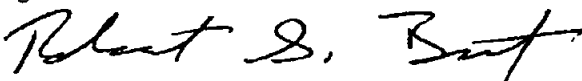
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL COR	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			BASF CORPORATION	PAY	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	

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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			INTERREGIONAL RESEARCH PROJECT NO. 4 (IR-4)	PL	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			U.S. EPA	PL	
			SANDOZ WELLMARK INTERNATIONAL	OLD OLD	
			VELSICOL CHEMICAL CORP	OLD	RED

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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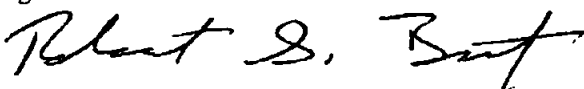
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Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			UNKNOWN	OLD	RED
			UNKNOWN	OLD	RED
			UNKNOWN	OLD	RED
			UNKNOWN	OLD	RED
			UNKNOWN	OLD	RED
			BASF CORPORATION	OLD	
			BASF CORPORATION	OLD	
			SANDOZ AGRO INC	OLD	
			BASF CORPORATION	OLD	
			U.S. EPA	PL	
			Velsicol Chemical Corp.	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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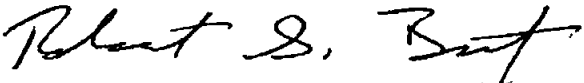
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**DATA MATRIX**

Date: <b>July 28 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 12 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>		Product: <b>AgSaver Dicamba Technical</b>
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SANDOZ AGRO INC	OLD	
			E. I. DUPONT DE NEMOURS	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			E. I. DUPONT DE NEMOURS	OLD	
			SANDOZ AGRO INC	OLD	
			SANDOZ AGRO INC	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			VELSICOL CHEMICAL CORP	OLD	
			BASF CORPORATION	OLD	
			BASF CORP	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

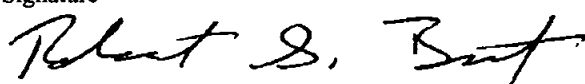
Form Approved OMB No. 2070-0060

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**DATA MATRIX**

Date: <b>July 28 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 13 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			AHETF	PAY	
			AHETF	PAY	
			ARTF, AHETF	PAY	
			ARTF, AHETF	PAY	
			U.S. EPA	PL	
			ARTF	PAY	
			SYNGENTA CROP PROTECTION, LLC U.S. EPA	PAY PL	RED <sup>1</sup>
			ARTF	PAY	
			ARTF	PAY	
			Generic Endangered Species Task Force	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460

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## DATA MATRIX

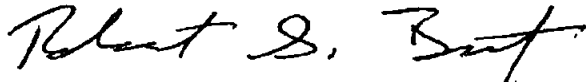
Date: <b>July 28 2015</b>	EPA Reg No./ File Symbol <b>85806-4</b>	Page 14 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

## End Notes

1. This study is classified as an 875.2200 study in the Dicamba RED, but in NPIRS appears as an 875.2100 study. The study title also indicates it is probably an 875.2100 study.

AgSaver II, LLC will make offers-to-pay to the following entities on the Data Submitters List of July 1, 2015:

1. AGRICULTURAL HANDLER EXPOSURE TASK FORCE
2. AGRICULTURAL REENTRY TASK FORCE
3. BASF CORPORATION
4. GENERIC ENDANGERED SPECIES TASK FORCE
5. SPRAY DRIFT TASK FORCE
6. SYNGENTA CROP PROTECTION, LLC

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 7/28/2015
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EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.  
{W0277296; 1}

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** D429490; **FILE SYMBOL No.:** 85806-4 (altCSF#1 screen); **PRODUCT NAME:** Agsaver Dicamba Technical; **DECISION No.:** 507395; **PC Code(s):** 029801; **ACTION CODE:** R351; **FOOD Use:** Yes

**DATE OUT:** October 9, 2015

**SUBJECT:** Revised Completeness check screening for technical product "Agsaver Dicamba Technical"

**FROM:** Shyam Mathur,  
Product Chemistry Team Leader  
CITAB / RD (7505P)

**TO:** Karen Samek / Kathryn Montague, RM 23  
Herbicide Branch / RD (7505P)

**Company Name:** Agsaver II, LLC  
**Formulation Type:** Herbicide  
**Active Ingredient(s):** Dicamba (98.75%)  
**MRID Nos:** Submitted – 49683601 to 49683604

**CONCLUSION:**

**Deficiencies:** No  
(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

**Group A:** All required data submitted

**Group B:** All required data submitted or cited

**CSF:** Current Basic CSF (dated 02-09-2015; Producer: [REDACTED])  
Proposed alternate CSF #1 (dated 07-25-2015; Producer – [REDACTED]) submitted

**Product label:** Not Submitted

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report the corrected deficiencies in response to 10 day letter, so that it can be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

\*Product ingredient source information may be entitled to confidential treatment\*

**Samek, Karen**

---

**From:** Mathur, Shyam  
**Sent:** Friday, October 09, 2015 1:36 PM  
**To:** Samek, Karen; Montague, Kathryn V.  
**Subject:** 45/90 day screen results for 85806-4  
**Attachments:** 85806-4 (altCSF#1 screen).doc

Shyam Mathur, Ph. D  
Product Chemistry Team Leader  
Chemistry, Inert & Toxicology Assessment Branch (CITAB)/RD (7505P)  
OCSPP/Environmental Protection Agency, USA  
Tel: 703-308-9374  
mathur.shyam@epa.gov

# PROCESSING REQUEST

Reg #:

85806-4

Decision #:

485797

Description:

new Product

## Material Available Electronically (see PPLS):

☐ Electronic Label/Letter Dated:

☐ Other:

## Material Sent (see jacket):

☐ Stamped Label/Letter Dated:

☐ Notification Dated:

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer:

Grant Rowland

Division:

RN/AB

Phone:

347-0254

Date:

3-31-15



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

85806-4

Date of Issuance:

3/30/15

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

AgSaver™ Dicamba Technical

Name and Address of Registrant (include ZIP Code):

AgSaver II, LLC  
P.O. Box 111  
McGehee, AR 71654

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 85806-4."
3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

Signature of Approving Official:

Kathryn Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

Date:

3/30/15

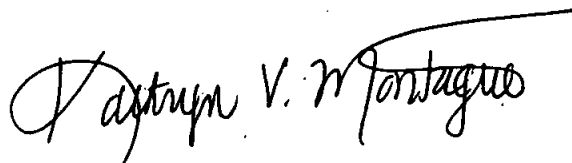
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 02/9/2015

If you have any questions, please contact Grant Rowland by phone at 703-347-0254, or via email at [Rowland.Grant@epa.gov](mailto:Rowland.Grant@epa.gov).

Sincerely,

A handwritten signature in black ink, reading "Kathryn V. Montague". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Kathryn V. Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**ACCEPTED****03/30/2015**

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 85806-4

## AgSaver™ Dicamba Technical FOR MANUFACTURING PURPOSES ONLY

Formulators who use this product are responsible for obtaining EPA registration for their formulated products.

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-o-anisic acid) ..... 98.9%

**OTHER INGREDIENTS:** ..... 1.1%

**TOTAL** ..... 100.0%

### KEEP OUT OF REACH OF CHILDREN DANGER

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.</p>	
<b>NOTE TO PHYSICIAN</b>	
<p>Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

See page [back] [side] [panel] [next page] for Directions for Use and for  
additional precautionary statements.

EPA Reg. No. 85806-

NET CONTENTS: \_\_\_\_\_

EPA Est. No.

[Batch Code: to appear on label or container]

MANUFACTURED FOR:  
AgSaver™ II, LLC  
203 East Ash Street • McGehee, AR 71654



## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your local State Water Board or Regional Office of the EPA.

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, teff, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms; (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

## **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

### **Container Disposal: [[Nonrefillable Inner Liner]**

**Liner:** Nonrefillable container. Do not reuse or refill this bag. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.] [and/or]

### **[[Non-refillable Exterior Container]**

**[Exterior Bag:] [OR] [Exterior Drum:]** [Nonrefillable container. Do not reuse or refill this container. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.]] [and/ or]

### **[[Refillable Exterior Container]**

**[Exterior Bag:] [OR] [Exterior Drum:]** [Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. If container is contaminated or damaged, it cannot be reused. Completely empty container into equipment. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures. Emptying the container before final disposal is the responsibility of the person disposing of the container.]

## **CONDITIONS OF SALE AND LIMITATION OF WARRANTY**

Seller warrants that this product conforms with its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent permitted by applicable law buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable law, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

**FEE**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION  
  
OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DP BARCODE No.: D425660  
PC CODE: 029801  
FOOD USE: No

FILE SYMBOL NO.: 85806-U  
ACTION CODE: R 334  
PRODUCT NAME: AgSaver Dicamba Herbicide

DECISION No.: 485797

DATE OUT: March 23, 2015

SUBJECT: Manufacturing Use Product Chemistry Review  
Product Name: AgSaver Dicamba Technical

FROM: Bruce F. Kitchens, Chemist  
Product Chemistry Team  
Chemistry, Inerts and Toxicology Assessment Branch/RD (7505P)

*Bruce F. Kitchens*  
*24 Mar 2015*  
*SBM 8(2611)*

TO: RM 23, Kathryn V. Montague/Grant Rowland  
Herbicide Branch/RD (7505P)

**INTRODUCTION:**

The registrant, AgSaver II, LLC, is responding to a previous product chemistry review (D417765 8/21/14) for the proposed manufacturing use product, AgSaver Dicamba Technical. In that review, it was determined that the data requirements for product identity and composition (830.1550), discussion of the formation of impurities (830.1670), and preliminary analysis (830.1700) were not satisfied. Additional data regarding the impurity profile was required. Also a discrepancy in the reported density value required clarification. The active ingredient in this product is Dicamba at a label nominal concentration of 98.9% a.i. This product is intended for use as in the manufacture of herbicide end-use products. With this response, the registrant is submitting product chemistry data contained in MRID# 495651-01. The Chemistry, Inerts and Toxicology Assessment Branch (CITAB) has been asked to review this submission.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient: Dicamba (98.90% ai)

Formulation Type: Powder

2. The registrant submitted the following study:

Sun, G., Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans Analysis of Dicamba TGA1 (2015), Performing Laboratory: Southwest Research Institute, Project # 01.20881.01.001, Sponsor: USA AG Chemicals Incorporated, MRID# 495651-01.

3. The registrant states that this study was conducted in accordance with 40 CFR 160 Good Laboratory Practices Standards and was inspected by the quality assurance unit

DP BARCODE No.: D425660  
PC CODE: 029801  
FOOD USE: No

FILE SYMBOL NO.: 85806-U  
ACTION CODE: R 334  
PRODUCT NAME: AgSaver Dicamba Herbicide

DECISION No.: 485797

4. This study is intended to determine the polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) in Dicamba technical present at or above the concentration of 0.1 part per billion. Analyses of the samples was determined by high resolution gas chromatograph (HRGC)/high resolution mass spectrometer (HRMS). This method was validated for linearity, precision, accuracy specificity. Limit of quantification (LOQ) was also determined. Five batches of the proposed product were analyzed for PCDD and PCDF content.

Batch ID:

1. 201409008
2. 201409009
3. 201409010
4. 201409011
5. 201409012

**5. Results:**

The analysis for PCDDs and PCDFs indicates that no impurities were detected above the concentration of 0.1 ppb (parts per billion). No impurities were determined above the LOQ (limit of quantification). See the confidential appendix for tabulated data.

6. In an e-mail correspondence dated March 19, 2015, the registrant states that [REDACTED]

[REDACTED]

**CONCLUSIONS:**

The CITAB has reviewed the product chemistry data submitted for the proposed manufacturing use product and has concluded that:

1. The basic formula CSF for the proposed manufacturing use product, AgSaver Dicamba Technical dated 09 Feb 2015 is acceptable.
2. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.340 and 158.345 with respect to product identity and composition, the discussion of the formation of impurities and preliminary analysis. The impurity profile has been adequately detailed.
3. This submission satisfies the data requirement as specified in 40 CFR 158.310 with respect to physical and chemical properties for density (830.7300).

**\*Manufacturing process information may be entitled to confidential treatment\***





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** 417765; **FILE SYMBOL No.:** 85806-U; **PRODUCT NAME:** AgSaver Dicamba Technical; **DECISION No.:** 485797; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

**DATE:** August 21, 2014

**SUBJECT:** Product Chemistry Review of AgSaver Dicamba Technical"

**FROM:** Shyam Mathur, Ph. D  
Product Chemistry Team Leader  
Technical Review Branch/RD (7505P)

*S Mathur*  
*8/25/14*  
*JCR*

**TO:** Grant Rowland / Kathryn Montague, RM 23  
Herbicide Branch / RD (7505P)

**REGISTRANT:** AGSAVER II, LLC

**USE:** Herbicide

**FOOD USE:** Yes ☒ No ☐

**MRID Numbers:** 492733-01 to 492733-03

## Table of Contents

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## INTRODUCTION:

Sullivan Worcester on behalf of the registrant AgSaver II, LLC has submitted an application for the registration of the new technical product AgSaver Dicamba technical. The registrant has submitted a CSF for basic formulation (dated November 13, 2013) and the supporting product chemistry data (group A & group B) with MRID Nos. 492733-01 to 492733-03. The Dicamba technical is produced by [REDACTED] TRB has been asked to evaluate and determine the acceptability of the proposed basic CSF (dated 11-13-2013) and the supporting product chemistry data.

## SUMMARY OF FINDINGS:

### 1. The findings for Group A guideline data were as follows:

830.1550 (product identity & composition): The registrant has submitted a CSF for basic formulation (dated 11-13-2013). The product chemistry data corresponding to this guideline submitted on the CSF do not satisfy the data requirements of 40CFR§158.320. The nominal concentration 98.9% for AI concurs with the product label claim nominal concentration of 98.9%. No analysis for polychlorinated dioxins & furans was done [MRID 492733-01].

830.1600 (description of materials used to produce the product): The product chemistry data submitted corresponding to this guideline satisfy the data requirements of 40CFR§ 158.325. The registrant has submitted the MSDS's for all the starting materials used to produce the dicamba technical [MRID No. 492733-01].

830.1620 (description of production process): The product chemistry data submitted corresponding to this guideline satisfy the data requirements for 40CFR§158.330. The crude dicamba technical was produced in [REDACTED] leading to dicamba with 98% purity. The details of the production process have been provided by the registrant [MRID No. 492733-01].

830.1670 (discussion on the formation of impurities): The product chemistry data submitted corresponding to this guideline does not satisfy the data requirements for 40CFR§158.340. The registrant has listed only one impurity (in the proposed basic CSF 11-13-2013) which was identified and detected at the concentration of >0.1% in addition to water. Two other minor impurities were also detected at the concentrations of <0.1%. The registrant has provided the mechanisms of the formation of potential impurities in dicamba technical. No analysis was done to determine the presence of the impurities of tox concern like polychlorinated dioxins & dibenzofurans. These impurities must be identified and reported with their levels in the product [MRID No. 492733-01].

830.1700 (preliminary analysis): The product chemistry data submitted corresponding to this guideline to support the claims on the CSF does not satisfy the data requirements of 40CFR§158.345. The five lots of the test substance were analyzed to verify the concentration of Dicamba technical. The study was conducted at Nutrichem Laboratory Ltd., Beijing, China. The AI content and impurities were determined by HPLC-UV method. For the AI, the UV detector was operating at 230 nm and for impurities at 210 nm. The quantitation was done by using external standard technique. The analytical methods have been validated for linearity, accuracy and precision. No analysis was conducted for the impurities of tox concern like polychlorinated dioxin and dibenzofurans [MRID No. 492733 -02].

\*Product ingredient source information may be entitled to confidential treatment\*

\*Manufacturing process information may be entitled to confidential treatment\*

830.1750 (certified limits): The product chemistry data submitted corresponding to this guideline satisfy the requirements of 40CFR§158.350. The nominal concentrations for the active ingredient and the impurities are based on the five batch analysis [MRID No. 492733-01].

830.1800 (enforcement analytical method): The product chemistry data submitted corresponding to this guideline satisfy the requirements of 40CFR§158.355. The content of the active ingredient was determined by using HPLC-UV (280 nm) external standard technique. The analytical method was validated for precision, accuracy and linearity. [MRID No. 492733-01].

2. The 830 series group B guideline data (physical-chemical properties) submitted satisfy the data requirements of 40CFR§158.310(e), except for the guideline 830.7300 (density). The registrant has conducted accelerated studies for the guidelines 8307317 (storage stability) and 830.6320 (corrosion characteristics) and the test substance was found to be stable and no corrosive characteristics was observed for 2 weeks at 54 deg C. The Density value provided in the data does not concur with that given in the proposed basic CSF (4.85 g/cc vs 1.46 g/cc) [MRID No. 492733-03].

#### CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for proposed [REDACTED] to support the proposed revised basic CSF and has concluded that:

1. The product chemistry data submitted for guideline 830 Series group A are partially acceptable. No analysis (830.1700) was conducted for impurities of tox concern like polychlorinated dioxins & dibenzo furans. There are ingredients in the manufacturing process which may be responsible for the formation of these kind of impurities under the reaction conditions of the process. The registrant is recommended to do analysis for polychlorinated dioxins & dibenzofurans. These impurities if detected (at any levels) must be listed on the CSF.

2. The proposed CSF for basic formulation (dated 11-13-2014) is not acceptable. The registrant must submit the revised basic CSF as per Item #1.

3. The product chemistry data submitted and cited for guideline 830 Series group B are acceptable. The registrant must clarify the correct value of density of the proposed product. The Density value provided in the data does not concur with that given in the proposed basic CSF (4.85 g/cc vs 1.46 g/cc).

*cleared  
in review  
dated 3-23-15*

\*Product ingredient source information may be entitled to confidential treatment\*

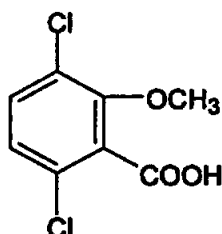


DP BARCODE No.: 417765; FILE SYMBOL No.: 85806-U; PRODUCT NAME: AgSaver Dicamba  
Technical; DECISION No.: 485797; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

830.1550. Product identity & composition: (MRID No. 492733-01)

### Manufacturer Details

COMMON NAME: Dicamba (ISO)  
STRUCTURAL FORMULA:



EMPIRICAL FORMULA:  $C_8H_6Cl_2O_3$   
M.W.: 221.0  
CAS No.: 1918-00-9  
PC Code: 29801  
CHEMICAL NAME: 3,6-dichloro-o-anisic acid  
SYNONYMS: Dicamba acid,  
Benzoic acid, 3,6-dichloro-2-methoxy-

\*Product ingredient source information may be entitled to confidential treatment\*

\*Manufacturing process information may be entitled to confidential treatment\*

DP BARCODE No.: 417765; FILE SYMBOL No.: 85806-U; PRODUCT NAME: AgSaver Dicamba Technical; DECISION No.: 485797; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

Group A Data

Table 1. Manufacturing and Impurity Data AgSaver II Dicamba Technical				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	49273301	N	Submitted basic CSF (dated 11-13-2013) with NC of 98.9% for the AI.
830.1600	Description of materials used to produce the product	" "	A	Submitted the MSDS's for all the starting materials used in the synthesis of Dicamba technical by [REDACTED]
830.1620	Description of production process	" "	A	The Dicamba technical was produced in [REDACTED]. The manufacturing process has been described in detail. The quality assurance procedures adopted in each step of the process have been included.
830.1670	Discussion of formation of impurities	49273301	N	Impurities discussed and identified. The discussions on the mechanisms of the formation of all impurities listed on the CSF have been provided. Only one impurity has been listed in the CSF. The registrant has not identified and not listed polychlorinated dioxins & dibenzofurans. No analysis was done.
830.1700	Preliminary analysis	49273302	N	The HPLC-UV method has been used for the determination, identification and quantitation of the active ingredient dicamba and the associated impurities. The details of the methods have been submitted along with the validation which included linearity, precision and accuracy, Lod & LOQ. No analysis was done for the toxic impurities like polychlorinated dioxins & dibenzofurans.
830.1750	Certified limits	49273301	A	The proposed limits for the AI and the impurities are based on five batch analysis.
830.1800	Enforcement analytical method	49273301	A	The HPLC/UV (280 nm) method was used for the determination of the AI contents. The external standard quatification technique was used. The method was validated for precision, linearity and accuracy.
A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress; U = Up-grade (additional information required);				

**DP BARCODE No.:** 417765; **FILE SYMBOL No.:** 85806-U; **PRODUCT NAME:** AgSaver Dicamba  
**Technical;** **DECISION No.:** 485797; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

**830 Series Subgroup B (Physical-Chemical properties)**

Table 2: Physical and Chemical Properties of : AgSaver Dicamba TGA/MUP				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	C o l o r	49273303	A	Off-white
830.6303	Physical state	" " "	A	Solid (fine powder)
830.6304	Odor	" " "	A	Mild
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	" " "	A	Stable at room temperature and also for 2 weeks at 54°C. Since the TS will not come in contact with metal & metal ions, this test is not required.
830.6314	Oxidation/reduction: chemical incompatibility	49273303	A	The TS was found to be compatible with water, 5% ammonium phosphate, Fe powder, %5 Potassium permanganate and Aromatic 200 fluid.
830.6315	Flammability		NA	
830.6316	Explosibility		NA	
830.6317	Accelerated Storage stability	49273303		Stable for 2 weeks at 54°C.
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics	49273303	A	No corrosion seen on the pouches made of polyethylene lined woven polymer fabric identical to the material used in commercial packaging (Super Sacks) when stored for 2 weeks at 54°C.
830.7000	pH	49273303	A	1.99 (1% dispersion) at 25°C
830.7050	UV/Visible absorption	49273303	A	See Note 1 below
830.7100	Viscosity		NA	
830.7200	Melting point	49273303	A	114-116°C
830.7220	Boiling point		NA	
830.7300	Density	49273303	U	Reported 4.86 g/cc; in the CSF it is 1.48 g/cc
830.7370	Dissociation constants in water (DC)	43288001	cited	
830.7550	Partition coefficient	41966601	cited	
830.7840	Water solubility:	44520902	cited	
830.7950	Vapor pressure	44520902I	cited	

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)

DP BARCODE No.: 417765; FILE SYMBOL No.: 85806-U; PRODUCT NAME: AgSaver Dicamba  
Technical; DECISION No.: 485797; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

**Note1. 830.7050 (UV-VIS):** (MRID No. 49273303)

**Table 4. UV/Visible Absorption of Dicamba 98%**

Conditions	Neutral Solution	Acidic Solution	Basic Solution
Concentration	$2.3529 \times 10^{-5} \text{ M}$	$3.0553 \times 10^{-5} \text{ M}$	$5.0921 \times 10^{-5} \text{ M}$
Peak Wavelengths	204.6 nm	201.7 nm	216.3 nm
Absorbance Maximum	0.7497 AU	1.0245 AU	0.6166 AU
Molar Absorptivity	32,000	34,000	12,000
Bandwidth	20 nm	20 nm	34 nm

DP BARCODE No.: 417765; FILE SYMBOL No.: 85806-U; PRODUCT NAME: AgSaver Dicamba  
Technical; DECISION No.: 485797; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

CONFIDENTIAL APPENDIX







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

DATE February 4 2014

**MEMORANDUM**

Subject: EPA File Symbol/Reg. No.: 85806-U  
Product Name: AgSaver Dicamba Technical  
DP Barcode: D417732  
Decision No.: 485797  
Action Code: R334  
PC Code: 029801

From: John C. Redden, M.S.  
Technical Review Branch (TRB)  
Registration Division (7505P)

JCR  
PVS

Through: OPP Similarity Clinic

To: Grant Rowland, RM23  
Herbicide Branch (HB)  
Registration Division (7505P)

Applicant: Agsaver II, LLC  
203 East Ash Street  
McGehee, AR 71654

<u>Active Ingredient</u>	<u>% by weight</u>
Dicamba (3,6-dichloro-o-anisic acid).....	98.9%
Inert Ingredients.....	<u>1.1%</u>
	100.0%

## OPP Similarity Clinic

EPA File Symbol.: 85806-U

EPA Reg. No. Cited: 42750-57

Reference information for review of cited data: The applicant cited EPA Reg. No. 42750-57 (Albaugh Technical Dicamba Acid MUP) and the acute toxicity studies cited in the Dicamba Reregistration Eligibility Decision (EPA-HQ\_OPP-2005-0479; FRL-8078-6).

## Summary/Findings:

## Tox Profile:

These are the acute toxicity studies extracted from the Dicamba RED.

MRID's	Gldn #	Acceptable Y/N	Results	Tox. Cat.
00078444	81-1	Y	LD <sub>50</sub> ≥ 2740 mg/kg/day	III
00241584	81-2	Y	LD <sub>50</sub> ≥ 2000 mg/kg	III
00263861	81-3	Y	LC <sub>50</sub> ≥ 5.3 mg/L	IV
00241584	81-4	Y	irritant	II
00237955	81-5	Y	irritant	II
00263861	81-6	Y	negative	N/A

However TRB is using the precautionary language from EPA Reg. No. 42750-57, which the applicant cited. In addition, TRB is uncertain of the purity of the acute studies cited in the RED.

LABELING:

KEEP OUT OF REACH OF CHILDREN

DANGER

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment ~~advice~~

advice



**IF SWALLOWED:**

- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

**IF ON SKIN OR CLOTHING:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

December 11, 2013

Via Courier

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

Document Processing Desk (REGFEE)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard Room S-4900  
2777 S. Crystal Drive  
Arlington, VA 22202

ATTN: Kathryn Montague, Product Manager #23

Re: Application for Registration of AgSaver™ Dicamba Technical, EPA Reg. No. 85806-I

Dear Ms. Montague:

On behalf of AGSAVER II, LLC, we are submitting an application for a me-too registration of AgSaver™ Dicamba Technical, EPA Reg. No. 85806-I.

We are submitting this application as a PRIA Action Code R334, New product; MUP with unregistered source of the active ingredient. We are using the selective method of data citation and cite-all option for selected data requirements. The product is being registered for Terrestrial Food Crop; Terrestrial Nonfood Crop, and Terrestrial Noncrop uses for which US EPA has accepted required data and/or citations of data in support of registration.

Please find attached:

1. Transmittal Document
2. Application Form (EPA Form 8570-1)
3. Confidential Statement of Formula, dated 11/15/2013 (EPA Form 8570-4)
4. Certification with Respect to Citation of Data, dated 12/9/2013 (Form 8570-34)
5. Data Matrix, dated 11/18/2013 (EPA Form 8570-35, Agency and Public Use)
6. 5 copies of proposed label, dated 11/26/2013
7. 3 copies each of the study reports
8. A copy of a letter from AgSaver II showing Sullivan & Worcester LLP as authorized agent.
9. A copy of the PRIA fee email receipt.

The Preliminary Analysis study (Guideline 830.1700, Volume 3 of this submission) has been previously submitted and reviewed by EPA/OPP. The MRIDs for these previously submitted

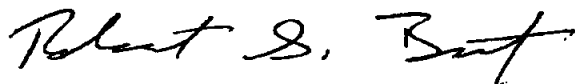
Page 2  
December 11, 2013

studies are: 47634901, 48420502 and 49206102. To the best of my knowledge this study has been found to be acceptable.

We have sent Offer-to-Pay letters to all the entities listed at the bottom of the Data Matrix.

If you have any questions regarding this submission, please do not hesitate to contact me.

Best regards,



Robert G. Butz  
Staff Scientist/ Authorized Agent

Direct line: 202-775-1211  
rbutz@sandw.com

#### Attachments

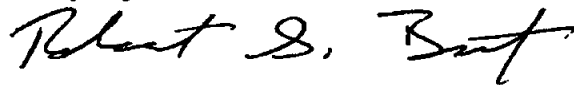
cc: Telisport W Putsavage, Sullivan & Worcester  
Clarke Pugh, AgSaver II, LLC

## TRANSMITTAL DOCUMENT

**Submitter:**

AgSaver II, LLC  
203 East Ash Street  
McGehee, AR 71654

EPA Company Number 85806

**Company Contact:**


Robert G. Butz, Staff Scientist/Authorized Agent  
Sullivan & Worchester LLP  
1666 K St. NW, Suite 700  
Washington, DC 20006

Phone: 202-775-1211

Email Address: rbutz@sandw.com

**Regulatory Action in Support of Which this Package is Submitted:**

Application for "Me-too" Registration of AgSaver Dicamba Technical (85806-1) ( )

**Submission Date:**

12/1/2013

**List of Submitted Documents:**

Volume 1	MRID
<p><b>Administrative Materials:</b></p> <ol style="list-style-type: none"> <li>1. Application Form (EPA Form 8570-1)</li> <li>2. Confidential Statement of Formula, dated 11/13/2013 (EPA Form 8570-4)</li> <li>3. Certification with Respect to Citation of Data, dated 11/55/2013 (Form 8570-34)</li> <li>4. Data Matrix, dated 11/15/2013 (EPA Form 8570-35, Agency and Public Use)</li> <li>5. 5 copies of proposed label, dated 11/26/2013)</li> <li>6. 3 copies each of 3 enclosed reports</li> <li>7. A copy of the AgSaver II letter showing Sullivan &amp; Worchester LLP as authorized agent.</li> <li>8. Copy of PRIA fee payment email receipt</li> </ol>	<p>-----</p>

Volume 2	Butz, R. G. 2013. AgSaver Dciamba Technical: Description of Beginning Materials and Manufacturing Process, Discussion of Formation of Impurities and Certified Limits. OCSPP 830.1550, 830.1600, 830.1620 830.1670 and 830.1750. Report No. Dicamba -001. 132 pages.	<b>49273301</b>
Volume 3	Li, H. 2008. Preliminary Analysis and Enforcement Method of Dicamba TGA1 . OCSPP 830.1700 and 830.1800. Nutrichem Laboratory Co. Ltd. Report No. NC-2007-024. 1/27/2008. 91 pages.	<b>49273302</b>
Volume 4	Miller, R.L. 2013. Physical and Chemical Characteristics of Dicamba 98%. OCSPP 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6317, 830.6320 830.7000, 830.7200, & 830.7300. ARC, Inc. Report No. ARC-EX-1265-017-P-1. 10/30/2013. 72 pages.	<b>49273303</b>



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

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WASHINGTON, D.C. 20460

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## DATA MATRIX

Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-X t</b>	Page 1 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Product Properties				
830.1550	Product Identity and Composition	Volume 2	AgSaver II, LLC	OWN	
830.1600	Description of materials used to produce the product	Volume 2	AgSaver II, LLC	OWN	
830.1620	Description of production process	Volume 2	AgSaver II, LLC	OWN	
830.1670	Formation of Impurities	Volume 2	AgSaver II, LLC	OWN	
830.1700	Preliminary Analysis	Volume 3	AgSaver II, LLC	OWN	
830.1750	Certification of Limits	Volume 2	AgSaver II, LLC	OWN	
830.1800	Analytical Method	Volume 3	AgSaver II, LLC	OWN	
830.6302	Color	Volume 4	AgSaver II, LLC	OWN	
830.6303	Physical State	Volume 4	AgSaver II, LLC	OWN	
830.6304	Odor	Volume 4	AgSaver II, LLC	OWN	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	Volume 4	AgSaver II, LLC	OWN	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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401 M Street, S.W.  
WASHINGTON, D.C. 20460

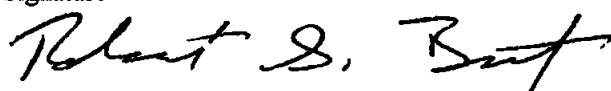
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6314	Oxidation/reduction: Chemical Incompatibility	Volume 4	AgSaver II, LLC	OWN	
830.6315	Flammability	N/A	AgSaver II, LLC	N/A	N/A per 830.1000
830.6316	Explosibility	N/A	AgSaver II, LLC	N/A	N/A per 830.1000
830.6320	Corrosion Characteristics	Volume 4	AgSaver II, LLC	OWN	
830.6376	Storage Stability	Volume 4	AgSaver II, LLC	OWN	
830.7000	pH	Volume 4	AgSaver II, LLC	OWN	
830.7050	UV/Visible Absorption	Volume 4	AgSaver II, LLC	OWN	
830.7200	Melting Point	Volume 4	AgSaver II, LLC	OWN	
830.7300	Density	Volume 4	AgSaver II, LLC	OWN	
830.7370 ✓	Dissociation Constants in Water	43288001, 43140308, 44520902	SANDOZ AGRO INC, SANDOZ AGRO INC ALBAUGH INC	OLD OLD OLD	
830.7550 ✓	Partition coefficient, shake flask method	41966601 23106	SANDOZ AGRO INC VELSICOL CHEMICAL CORP	OLD OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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**DATA MATRIX**

Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-1 U</b>	Page 3 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7570 ✓	Octanol/Water Partition	44520902	ALBAUGH INC	OLD	
830.7840 ✓	Solubility	23106, 44520902	VELSICOL CHEMICAL CORP ALBAUGH INC	OLD OLD	
830.7950 ✓	Vapor Pressure	23106	VELSICOL CHEMICAL CORP	OLD	
	Fate, Transport and Transformation				
835.1240 ✓	Leaching/Adsorption/Desorption	42774101, 43095301	Sandoz Agro, Inc. Sandoz Agro, Inc.	OLD OLD	
835.1410 ✓	Laboratory Volatilization	41966602	Sandoz Crop Prot. Corp.	OLD	
835.2120 ✓	Hydrolysis	40335501	Velsicol Chemical Corporation,	OLD	
835.2240 ✓	Photodegradation - Water	42774103	Sandoz Agro, Inc	OLD	
835.2410 ✓	Photodegradation - Soil	42774103	Sandoz Agro, Inc	OLD	
835.4100 ✓	Aerobic Soil Metabolism	43245207	Sandoz Agro. Inc	OLD	
835.4200 ✓	Anaerobic Soil Metabolism	43245208	Sandoz Agro. Inc	OLD	
835.4300 ✓	Aerobic Aquatic Metabolism	43758509	Sandoz Agro. Inc	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-1 U</b>	Page 4 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.4400 ✓	Anaerobic Aquatic Metabolism	43245208	Sandoz Agro. Inc	OLD	
835.6100 ✓	Terrestrial Field Dissipation	42754101, 42754102, 44361526	Sandoz Agro, Inc. Sandoz Agro, Inc. UNKNOWN	OLD OLD OLD	
835.8100 ✓	Fate in Soil - Leaching & Adsorption/Desorption	48876002 47434312	MONSANTO U.S. EPA	PL PL	
	Spray Drift				
840.1100 ✓	Spray Droplet Size Spectrum	Cite-all	Spray Drift Task Force	PAY	
840.1200 ✓	Spray Drift Field Deposition	Cite-all	Spray Drift Task Force	PAY	
	Ecological Effects				
850.1010 ✓	Freshwater Invertebrate Toxicity	00052126	VELSICOL CHEMICAL CORP	OLD	
850.1010 ✓	Invertebrate Toxicity - TEP	40094602	U.S. FISH & WILDLIFE	PL	
850.1025 ✓	Estuarine/Marine Toxicity - Mollusk	40228401	U.S. EPA	OLD	
850.1035 ✓	Estuarine/Marine Toxicity - Shrimp	00034702	VELSICOL CHEMICAL CORP	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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## DATA MATRIX

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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1075	Fish Toxicity Bluegill	00034703	VELSICOL CHEMICAL CORP	OLD	
850.1075	Fish Toxicity Bluegill — TEP	40098001	US Fish & Wildlife Service	PL	
850.1075	Freshwater Fish Toxicity Rainbow Trout	00041272	VELSICOL CHEMICAL CORP	OLD	
850.1075	Freshwater Fish Toxicity Rainbow Trout - TEP	00036915	VELSICOL CHEMICAL CORP	OLD	
850.1075	Estuarine/Marine Toxicity - Fish	00025390 45205107	VELSICOL CHEMICAL CORP U.S. EPA	OLD PL	
850.2100	Avian Acute Oral Toxicity-Duck	42774106	SANDOZ AGRO INC	OLD OLD	
850.2100	Avian Acute Oral Toxicity-Quail	42774105	SANDOZ AGRO INC	OLD	
850.2300	Avian Reproduction - Quail	43814004	SANDOZ AGRO INC	OLD	
850.2300	Avian Reproduction — Duck	43814003	SANDOZ AGRO INC	OLD	
850.3020	Honey Bee Acute Contact	00036935	ENIMONT AMERICA, INC	OLD	
850.4100	Seedling Germination and Seedling Emergence, Tier I	42846301	SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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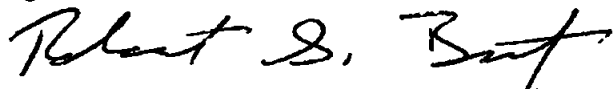
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**DATA MATRIX**

Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-1, (J)</b>	Page 6 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4150	Vegetative Vigor, Tier I	42846301	SANDOZ AGRO INC	OLD	
850.4200	Effects on Non-Target Plants - Seed Germination & Vegetative Vigor	48718014	BASF CORPORATION	PAY	
850.4225	Seedling Germination and Seedling Emergence, Tier II	48001301	BASF CORPORATION	PAY	
850.4250	Vegetative Vigor, Tier II	48001302	BASF CORPORATION	PAY	
850.4400	Aquatic Plant Toxicity testing using <i>Lemna</i> , sp.	45088212	U.S. EPA	PL	
850.5400	Aquatic Plant Growth	42774107, 42774108, 42774109, 42774100, 42774110	SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD OLD OLD OLD	
	Residue Chemistry				
860.1300	Nature of Residue — Plants	40642801	SANDOZ AGRAO INC	OLD	
860.1300	Nature of Residue — Livestock	43461701	WELLMARK INTERNATIONAL	OLD	

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Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-1 (j)</b>	Page 7 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1340	Residue Analytical Method — Plants	40233501, 40547911, 41187301, 42675901, 42883202, 43245203, 43245205, 43245205, 43245206, 43274501, 43370701, 43425803, 43866601, ✓ 43814101, 44089302, 44089303, ✗ 44089304, ✗ 44089305, 44891302,	SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC WELLMARK INTERNATIONAL SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC SANDOZ AGRO INC BASF CORPORATION	OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		44891303, 45196801, 43814001 48001303	BASF CORPORATION BASF CORPORATION SANDOZ AGRO INC BASF CORP	PAY PAY OLD PAY	
860.1340	Residue Analytical Method - Livestock	Data gap		GAP	RED
860.1360	✓ Multiresidue Methods	48001304	BASF CORP	PAY	
860.1380	✓ Storage Stability- sugarcane molasses	Data gap		GAP	RED
860.1380	✓ Storage Stability- animal commodities	Data gap		GAP	RED
860.1480	MOR - Cattle, Goats, Horses and Sheep Meat	00079742	VELSICOL CHEMICAL CORP	OLD	
860.1480	MOR - Cattle, Goats, Horses and Sheep Meat Byproducts	00079742	VELSICOL CHEMICAL CORP	OLD	
860.1480	MOR - Cattle, Goats, Horses and Sheep Fat	00079742	VELSICOL CHEMICAL CORP	OLD	
860.1480	MOR - Milk	00116671	VELSICOL CHEMICAL COR	OLD	
860.1500	MOR - Corn, Grain	44089303	SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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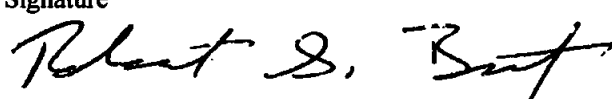
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Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-X (J)</b>	Page 9 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	MOR - Corn, Stover	44089303	SANDOZ AGRO INC	OLD	
860.1500	MOR - Corn, Sweet	48001305	BASF CORPORATION	PAY	
860.1500	Corn, Forage	44089303	SANDOZ AGRO INC	OLD	
860.1500 ✓	MOR - Soybean, forage	40001901 41387001	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1500 ✓	MOR - Soybean, hay	40001901 41387001	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1500 ✓	MOR - Sugarcane	00030701 44089302	VELSICOL CHEMICAL CORP SANDOZ AGRO INC	OLD OLD	
860.1500	MOR - Sorghum, Grain	43245203	SANDOZ AGRO INC	OLD	
860.1500	MOR -Sorghum, Stover	44089306	SANDOZ AGRO INC	OLD	
860.1500	MOR - Sorghum, Forage	43245203	SANDOZ AGRO INC	OLD	
860.1500	MCR - Stalk, Stem, and Leaf Petiole Vegetables	48499801	INTERREGIONAL RESEARCH PROJECT NO. 4 (IR-4)	PL	
860.1500	MOR - Wheat, Grain	44089305	SANDOZ AGRO INC	OLD	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC</b> <b>203 E. Ash Ave.</b> <b>McGehee, AR 71654</b>	Product:  <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	MOR - Wheat, Forage	43274501	SANDOZ AGRO INC	OLD	
860.1500	MOR - Wheat, Straw	44089305	SANDOZ AGRO INC	OLD	
860.1520	Magnitude of Residue in Processed Food/Feed; Wheat	40663801, 42675901	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	
860.1560	Reasonable Grounds in Support of Petition - Exposure or Risk to Non-Target Organisms	48457909	U.S. EPA	PL	
860.1850	Confined Accumulation in Rotational Crops	41972001, 43698601	SANDOZ WELLMARK INTERNATIONAL	OLD OLD	
	Health Effects				
870.1100	Acute Oral Toxicity	00078444	VELSICOL CHEMICAL CORP	OLD	RED
870.1200	Acute Dermal Toxicity	00241584	UNKNOWN	OLD	RED
870.1300	Acute Inhalation Toxicity	00263861	UNKNOWN	OLD	RED
870.2400	Acute Eye Irritation	00241584	UNKNOWN	OLD	RED
870.2500	Acute Dermal Irritation	00237955	UNKNOWN	OLD	RED

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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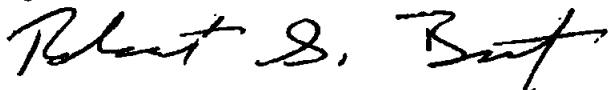
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.2600	Dermal Sensitization	00263861	UNKNOWN	OLD	RED
870.3100	Subchronic Oral Toxicity: 90- Day Study Rodent	44623101	BASF CORPORATION	OLD	
870.3150	Subchronic Oral Toxicity: 90- Day Study Non-rodent	44623101	BASF CORPORATION	OLD	
870.3200	21-Day Dermal - Rabbit/Rat	40547901, 45814501	SANDOZ AGRO INC BASF CORPORATION	OLD OLD	
870.3550	Developmental Toxicity - Mice	46074401	U.S. EPA	PL	
870.3700	Developmental Toxicity - Rat	00084024	Velsicol Chemical Corp.	OLD	
870.3700	Developmental Toxicity - Rabbit	42429401	SANDOZ AGRO INC	OLD	
870.3800	2-Generation Reproduction - Rat	43137101	SANDOZ AGRO INC	OLD	
870.4100	Chronic Feeding Toxicity - Rat	42774104	SANDOZ AGRO INC	OLD	
870.4100	Chronic Feeding Toxicity Study - Rat	00145150	E. I. DUPONT DE NEMOURS	OLD	
870.4100	Chronic Feeding Toxicity Study - Non-rodent	40321102, 43245210	SANDOZ AGRO INC SANDOZ AGRO INC	OLD OLD	

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Date: <b>November 18, 2013</b>	EPA Reg No./ File Symbol <b>85806-K ( )</b>	Page 12 of 14
Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4200	Carcinogenicity Mice	40872401	SANDOZ AGRO INC	OLD	
870.4300	Combined Chronic Toxicity/Carcinogenicity: Rats	00145150	E. I. DUPONT DE NEMOURS	OLD	
870.5100	Bacterial Reverse Gene Mutation	40321101	SANDOZ AGRO INC	OLD	
870.5375	Cytogenetics	40321101, 00143001	SANDOZ AGRO INC VELSICOL CHEMICAL CORP	OLD OLD	
870.5550	Unscheduled DNA Synthesis in Mammalian Cells in Culture	00143001	VELSICOL CHEMICAL CORP	OLD	
870.7485	General Metabolism	44609801	BASF CORPORATION	OLD	
870.7800	Immunotoxicity	48081601	BASF CORP	PAY	
	<b>Occupational and Residential Exposure</b>				
875.1000	Background for Application Exposure Monitoring	Cite-All	AHETF	PAY	
875.1100	Dermal Exposure -Outdoor	Cite-All	AHETF	PAY	
875.1200	Dermal Exposure - Indoor	Cite-All	ARTF, AHETF	PAY	
875.1300	Inhalation Exposure -Outdoor	Cite-All	ARTF, AHETF	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1400	Inhalation Exposure -Indoor	47464517	U.S. EPA	PL	
875.2100	Foliar Dislodgeable Residue Dissipation	Cite-All	ARTF	PAY	
875.2200	Soil Residue Dissipation	44959001 47299308	SYNGENTA CROP PROTECTION, LLC U.S. EPA	PAY PL	RED <sup>1</sup>
875.2400	Dermal Exposure - Postapplication	Cite-All	ARTF	PAY	
875.2500	Inhalation Exposure - Postapplication	Cite-All	ARTF	PAY	
Special	Exposure or Risk to Non-Target organisms	Cite-All	Generic Endangered Species Task Force	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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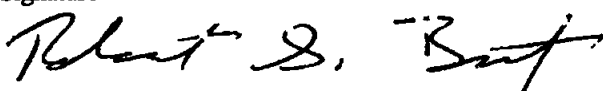
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Applicant's/Registrant's Name and Address: <b>AgSaver II, LLC 203 E. Ash Ave. McGehee, AR 71654</b>	Product: <b>AgSaver Dicamba Technical</b>	
Ingredient: <b>Dicamba</b>		

**End Notes**

1. This study is classified as an 875.2200 study in the Dicamba RED, but in NPIRS appears as an 875.2100 study. The study title also indicates it is probably an 875.2100 study.

**AgSaver II, LLC will make offers-to-pay to the following entities on the Data Submitters List of September 25, 2013:**

1. AGRICULTURAL HANDLER EXPOSURE TASK FORCE
2. AGRICULTURAL REENTRY TASK FORCE
3. BASF CORPORATION
4. GENERIC ENDANGERED SPECIES TASK FORCE
5. SPRAY DRIFT TASK FORCE
6. SYNGENTA CROP PROTECTION, LLC

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver II, LLC Sullivan & Worcester LLP	Date 11/18/2013
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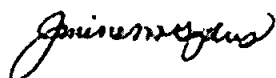
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
85806-I	9/19/2014	085806-xxxxx.20140919.AgSaverDicambaTechnicalW0271189.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

9/19/2104

Date

Janine M. Gydus  
Name (typed)

Scientist/Authorized Agent for AgSaver II, LLC  
Title

{W0271154; 1}

AgSaver II, LL C  
PO Box 111  
McGehee, AR 71654

September 19, 2013

**Via Email**

Document Processing Desk (COADR)  
Attention: Kathleen O'Malley  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Room S4900, One Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

Email: Omalley.kathleen@epa.gov

Re: Change in Authorized Company Representative for AgSaver II, LLC, EPA  
Company Number 85806

To Whom It May Concern:

This letter authorizes the following firm to act as our authorized agent in all pesticide registration matters. This authorization shall take effect immediately.

Sullivan & Worcester LLP  
1666 K Street, NW, Suite 700  
Washington, DC 20006  
202-775-1200

If you have any questions, please call me at (870) 222-5395. Thank you.


Sincerely,



Clarke Pugh

203 East Ash Street  
McGehee, AR 71654

cc: Janine Gydus, Sullivan & Worcester LLP

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

## Application for Pesticide – Section I

1. Company/Product Number <b>EPA Reg. No. 85806-U</b>	2. EPA Product Manager <b>Kathryn Montague</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>AgSaver™ Dicamba Technical</b>	PM # <b>23</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>AGSAVER II, LLC</b> <b>P. O. Box 111</b> <b>MCGHEE, AR 71654</b> <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. Product Name	

## Section – II

<input type="checkbox"/> Amendment – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification – Explain below	<input checked="" type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submission of an additional Product Chemistry study required by Agency in a letter dated 9/23/2014.

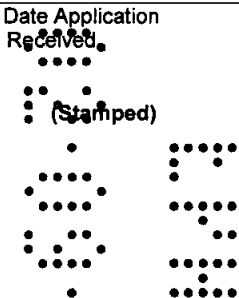
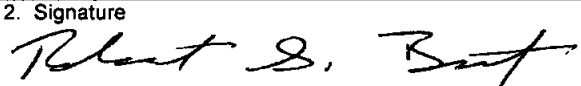
For PRIA decision code D-485797

Point of Contact: Robert Butz [rbutz@sandw.com](mailto:rbutz@sandw.com) 202-775-1211

## Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) <u>woven bag lined w/ polyethylene bag</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <b>800 kg</b>		5. Location of label directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other <u>Label in pouch</u>	

## Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>Robert G. Butz</b>	Title <b>Staff Scientist</b> <b>Sullivan &amp; Worcester LLP</b> <b>Authorized Agent for AgSaver II, LLC</b>	Telephone No. (Include Area Code) <b>202-775-1211</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		6. Date Application Received 
2. Signature 	3. Title <b>Staff Scientist, Sullivan &amp; Worcester LLP</b> <b>Authorized Agent for AgSaver II, LLC</b>	
4. Typed Name <b>Robert G. Butz</b>	5. Date <b>February 9, 2015</b>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Janine Gydus  
Agsaver II, LLC  
P.O. Box 111  
McGehee, AR 71654

SEP 23 2014

Subject: - Application for 85806-U  
Product Name: AgSaver™ Dicamba Technical  
EPA Application Dated: December 11<sup>th</sup>, 2014  
Decision Number: 485797

Dear Ms. Gydus,

The application referred to above has been determined, pursuant to 40 CFR 152.105, not to be sufficient for further processing. The items specified below must be addressed before processing of the application can be completed. If such deficiencies cannot be corrected within 75 days from the date of this letter, you must notify the Agency within those 75 days of the date you expect to complete the application. If, after 75 days, you do not respond, or you subsequently fail to complete the application within the scheduled times of completion, the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by you. As you see fit, you may also withdraw the registration application.

- No analysis (830.1700) was conducted for impurities of tox concern such as polychlorinated dioxins and dibenzo furans. There are ingredients in the manufacturing process which may be responsible for the formation of these kinds of impurities under the reaction conditions of the process. In order to correct this deficiency, please conduct an analysis at the currently accepted "State of the Art" level of detection (LOD) and report the top 17 impurities of tox concern on your CSF. Please note that you must also include non-detects on your CSF as well.

The current PRIA date for this action is 12/1/2014. Please contact the Agency regarding renegotiation of the due date, as it is not possible to have the above-mentioned deficiencies submitted and reviewed prior to the current due date. The renegotiated PRIA due date for this action will be extended by at least 90 days after we receive your resubmission. If you have any questions regarding these comments or the PRIA due date, please feel free to contact Grant Rowland at 703-347-0254 or via email at [rowland.grant@epa.gov](mailto:rowland.grant@epa.gov)

Sincerely,

Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

Recommendation of Division Directors Negotiated Due Dates			
Decision #: 485797		Registration #: 85806-U	
		Petition #:	
<input type="checkbox"/> See page 2 for additional registration entries			
Chemical Name: Dicamba			
Fee Category: R334		PRIA Decision Time Frame: 11 months	
Submitted by: Grant		Rowland	Branch: OCSPP/OPP/RD      Date: 11/25/2014
Company: AgSaver			
Original PRIA Due Date: 12/01/2015		Proposed New PRIA Due Date: 03/31/2015	
Previous Negotiated Due Dates:			
Is the "Fix" in-house?		If not, date "Fix" expected:	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> n/a			
Negotiated Due Date Reason:			
Additional Data Required	<input checked="" type="checkbox"/> Product Chemistry	<input type="checkbox"/> Toxicology	<input type="checkbox"/> Acute Tox <input type="checkbox"/> Environmental
	<input type="checkbox"/> Efficacy	<input type="checkbox"/> Ecological	<input type="checkbox"/> Residue <input type="checkbox"/> Other
Data Deficiencies	<input checked="" type="checkbox"/> Product Chemistry	<input type="checkbox"/> Acute Tox	<input type="checkbox"/> Efficacy <input type="checkbox"/> Residue <input type="checkbox"/> Toxicology
	<input type="checkbox"/> Environmental	<input type="checkbox"/> Ecological	<input type="checkbox"/> Labeling <input type="checkbox"/> Other <input type="checkbox"/> Not Submitted
Late Risk Assessment	<input type="checkbox"/> Human Health	<input type="checkbox"/> Ecological	
Interim Consideration	<input type="checkbox"/> Agency Initiated <input type="checkbox"/> Registrant Initiated		
<input type="checkbox"/> CSF	<input type="checkbox"/> Public Process	<input type="checkbox"/> Risk Issues Environmental	<input type="checkbox"/> Risk Issues Human Health
<input checked="" type="checkbox"/> Impurities Review	<input type="checkbox"/> Label	<input type="checkbox"/> Administrative-FR Notice	<input type="checkbox"/> Other – Comment Field
Summary of Deficiency Type(s): <input type="checkbox"/> Not Submitted (N) <input type="checkbox"/> Deficiencies (D)			
Product Chemistry: <input checked="" type="checkbox"/> Acute Tox: <input type="checkbox"/> Efficacy: <input type="checkbox"/> Labeling: <input type="checkbox"/> Ecological Data: <input type="checkbox"/> Other (describe): <input type="checkbox"/>			
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):			
The registrant agreed to the terms listed out in a 75 day letter sent on Sept 23, 2015. Once the registrant was able to schedule the necessary analysis needed with an approved lab, they contacted the EPA with a confirmation of completion date and agreed to a new PRIA date of 90 days out from when the data will be submitted to the Agency.			
"75 Day" Letter sent? <input checked="" type="checkbox"/> Yes, Date sent 09/23/2015 <input type="checkbox"/> No and reason for none? <i>Add comments on page 2</i>			
Rationale for Proposed Due Date: 90 days from the date that the new data is submitted			
Registrant notified that this is the last negotiation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable			
Approve: <input type="checkbox"/>		Disapprove: <input type="checkbox"/>	
If disapproved, action to be taken:			
OD or DOD Signature:			Date:



<b>Decision #:</b> 485797	<b>Registration #:</b> 85806-U	<b>Petition #:</b>

**Issue(s) (describe in detail):**

No analysis (830.1700) was conducted for impurities of tox concern such as polychlorinated dioxins and dibenzo furans. There are ingredients in the manufacturing process of Dicamba which may be responsible for the formation of these kinds of impurities under the reaction conditions of the process. In order to correct this deficiency, one must conduct an analysis at the currently accepted "State of the Art" level of detection (LOD) and report the top 17 impurities of tox concern on their CSF.

**Comment(s):**

# **Audit Trail for**

## **Recommendation of Division Directors Negotiated Due Dates**

**PDF Name:** PRIAv5.pdf

**Form Number:** PRIA

**Document Identifier:** PRIA-14329105909-GR

SUBMITTED on 11/25/2014 at 11:22:57 AM by CN=Grant Rowland/OU=DC/O=USEPA/C=US

**Rowland, Grant**

---

**From:** Butz, Ph.D., Robert G. <rbutz@sandw.com>  
**Sent:** Thursday, November 20, 2014 5:45 PM  
**To:** Rowland, Grant  
**Subject:** AgSaver Dicamba Technical

Grant,

By this email AgSaver II LLC agrees to a renegotiated PRIA due date of March 31, 2015 for the PRIA Decision No. 485797.

Please email or call me if you need anything else.

--Bob Butz

Robert G. Butz, Ph.D.  
Staff Scientist/ Authorized Agent  
Sullivan and Worcester LLP  
1666 K Street, NW  
Washington, DC 20006

Phone: 202 775 1211  
Email: rbutz@sandw.com

This message is intended to be confidential and may be legally privileged. It is intended solely for the addressee. If you are not the intended recipient, please delete this message from your system and notify us immediately. Any disclosure, copying, distribution or action taken or omitted to be taken by an unintended recipient in reliance on this message is prohibited and may be unlawful.

## Rowland, Grant

---

**From:** Gydus, Janine M. <jgydus@sandw.com>  
**Sent:** Friday, September 19, 2014 10:11 AM  
**To:** Rowland, Grant  
**Cc:** Putsavage, Telisport W.; Butz, Ph.D., Robert G.  
**Subject:** RE: Minor errors in draft labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797  
**Attachments:** Cert for Elect Label 085806-xxxxx.20140919.AgSaverDicambTechW0271189 (W0271190).PDF; 085806-xxxxx.20140919.AgSaverDicambaTechnicalrevW0271189 (W0271189).PDF

Grant,

Thank you for the opportunity to make minor changes to the draft label. Please find attached revised labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797. I have also included Certification with Respect to Label Integrity.

1. I added brackets in Container Handling to show that certain text will only be used for applicable container type/size.

2. I changed "Do not reuse or refill this bag" to "Do not reuse or refill this container" because a bag or drum may be used.

*[Non-refillable Exterior Container] [Exterior Bag:] [OR] [Exterior Drum:] [Nonrefillable container. Do not reuse or refill this bag. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.]*

Thank you,

**Janine M. Gydus**  
**Staff Scientist**  
**Sullivan & Worcester LLP**  
1666 K Street, NW • Washington, DC 20006  
T 202 775 1235  
F 202 293 2275  
jgydus@sandw.com  
www.sandw.com

---

**From:** Rowland, Grant [mailto:Rowland.Grant@epa.gov]  
**Sent:** Friday, September 19, 2014 9:27 AM  
**To:** Gydus, Janine M.  
**Cc:** Putsavage, Telisport W.; Butz, Ph.D., Robert G.  
**Subject:** RE: Minor errors in draft labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797

Hello Janine,

Yes, sending me a new label is not a problem at all. Please send away.

On a different note regarding this product, I recently received the Product chemistry review back and there was in fact an issue with your data. I am in the midst of Drafting you an official letter, but I thought I would give you a heads up considering time may be of a factor. The EPA technical review branch noted the following:

- No analysis (830.1700) was conducted for impurities of tox concern such as polychlorinated dioxins and dibenzo furans. There are ingredients in the manufacturing process which may be responsible for the formation of these kinds of impurities under the reaction conditions of the process. In order to correct this deficiency, please conduct an analysis at the currently accepted "State of the Art" level of detection (LOD) and report the top 17 impurities of tox concern on your CSF. Please note that you must also include non-detects on your CSF as well

Again, I will be sending you out an official letter early next week, but hopefully this gives you some additional time to start preparing. Please feel free to contact me with any questions you may have.

-Grant

Grant Rowland  
Herbicide Branch  
Registration Division  
Office of Pesticide Programs  
703-347-0254

---

**From:** Gydus, Janine M. [<mailto:jgydus@sandw.com>]  
**Sent:** Friday, September 19, 2014 9:06 AM  
**To:** Rowland, Grant  
**Cc:** Putsavage, Telisport W.; Butz, Ph.D., Robert G.  
**Subject:** FW: Minor errors in draft labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797

Good morning, Grant.

Kay Montague sent me an email earlier this week (see below) that I may email a revised draft label for AgSaver Dicamba Technical, OPP Decision No. D-485797. Would you please confirm that you will permit this? The changes are very minor. Thank you.

**Janine M. Gydus**  
**Staff Scientist**  
**Sullivan & Worcester LLP**  
1666 K Street, NW • Washington, DC 20006  
T 202 775 1235  
F 202 293 2275  
[jgydus@sandw.com](mailto:jgydus@sandw.com)  
[www.sandw.com](http://www.sandw.com)

---

**From:** Montague, Kathryn V. [<mailto:Montague.Kathryn@epa.gov>]  
**Sent:** Monday, September 15, 2014 9:58 AM  
**To:** Gydus, Janine M.; Rowland, Grant  
**Cc:** Putsavage, Telisport W.; Butz, Ph.D., Robert G.  
**Subject:** RE: Minor errors in draft labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797

Hi, Janine,

I'm forwarding this email to the reviewer, Grant Rowland. I think you should still be able to send us a revised label – Grant, can you confirm? Via email is fine, no need to go through the front end.

Best Regards,  
Kay

---

**From:** Gydus, Janine M. [<mailto:jgydus@sandw.com>]

**Sent:** Friday, September 12, 2014 2:15 PM

**To:** Montague, Kathryn V.

**Cc:** Putsavage, Telisport W.; Butz, Ph.D., Robert G.

**Subject:** Minor errors in draft labeling for AgSaver Dicamba Technical, OPP Decision No. D-485797

Kathryn,

We submitted an application for registration for AgSaver Dicamba Technical on December 11, 2013 and EPA assigned the application an OPP Decision No. of 485797. I found a couple of typos in the container handling directions of the draft labeling.

First, there should be brackets around directions for the disposable liner to indicate that it is optional and the directions only will be only label when a liner is used.

And, secondly, "Do not reuse or refill this bag" for the statement below should instead state "Do not reuse or refill this container" because a bag or drum may be used.

**[Non-refillable Exterior Container] [Exterior Bag:] [OR] [Exterior Drum:]** [Nonrefillable container. Do not reuse or refill this bag. Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by other procedures.]

Is it too late to submit a revised label prior to registration? If it is not too late, may I send revised labeling to you by email or do I need to submit via Document Processing?

Thank you,

**Janine M. Gydus**

**Staff Scientist**

**Sullivan & Worcester LLP**

1666 K Street, NW • Washington, DC 20006

T 202 775 1235

F 202 293 2275

[jgydus@sandw.com](mailto:jgydus@sandw.com)

[www.sandw.com](http://www.sandw.com)

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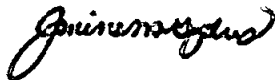
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
85806-I	9/19/2014	085806-xxxxxx.20140919.AgSaverDicambaTechnicalW0271189.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

9/19/2104

Date

Janine M. Gydus  
Name (typed)

Scientist/Authorized Agent for AgSaver II, LLC  
Title

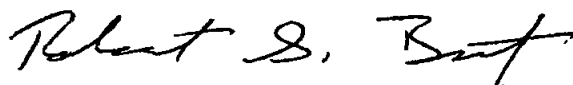
{W0271154; 1}

## TRANSMITTAL DOCUMENT

**Submitter:**

AgSaver II, LLC  
203 East Ash Street  
McGehee, AR 71654

EPA Company Number 85806

**Company Contact:**


Robert G. Butz, Staff Scientist/Authorized Agent  
Sullivan & Worcester LLP  
1666 K St. NW, Suite 700  
Washington, DC 20006

Phone: 202-775-1211

Email Address: rbutz@sandw.com

**Regulatory Action in Support of Which this Package is Submitted:**

Submission of Additional Product chemistry study for "Me-too" Registration of AgSaver  
Dicamba Technical (85806-U), Decision # D-485797

**Submission Date:**

2/9/2015

**List of Submitted Documents:**

		MRID
Volume 1	Administrative Materials: 1. Application Form (EPA Form 8570-1) 2. Confidential Statement of Formula, dated 2/09/2015 (EPA Form 8570-4)	-----
Volume 2	Sun, Gang. 2015. Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans Analysis of Dicamba TGA. OPPTS 830.1700, 830.1800. Southwest Research Institute. Project # 01.20881.01.001. GLP-SP-243. 2/6/2015. 59 pages	----- 49565101





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number

**AGSAVER II, LLC**  
**203 EAST ASH STREET**  
**MCGEEHEE AR 71654**

EPA Registration Number/File Symbol

**85806-1 U**

Active Ingredient(s) and/or representative test compound(s)

**Dicamba, CAS Reg. No. 1918-00-9**

Date **November 18, 2013**

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)

**Terrestrial Food Crop; Terrestrial Nonfood Crop, Terrestrial Noncrop uses for which US EPA has accepted required data and/or citations of data in support of registration; and uses for experimental purposes in compliance with US EPA.**

Product Name

**AgSaver Dicamba Technical**

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulators Exemption Statement (EPA Form 8570-27)

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose)



I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method, or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section 1, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitted to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment of both under applicable law.

Signature

*Clarke Pugh*

Date

**12/9/13**

Typed or Printed Name and Title

**Clarke Pugh,  
Member, AgSaver II, LLC**

**Butz, Ph.D., Robert G.**

---

**From:** Clarke Pugh <clarkepugh@yahoo.com>  
**Sent:** Monday, December 09, 2013 3:56 PM  
**To:** Butz, Ph.D., Robert G.  
**Subject:** Fw: Pay.gov Payment Confirmation: PRIA Service Fees

----- Forwarded Message -----

**From:** "paygovadmin@mail.doc.twai.gov" <paygovadmin@mail.doc.twai.gov>  
**To:** "clarkepugh@yahoo.com" <clarkepugh@yahoo.com>  
**Sent:** Monday, December 9, 2013 2:48 PM  
**Subject:** Pay.gov Payment Confirmation: PRIA Service Fees

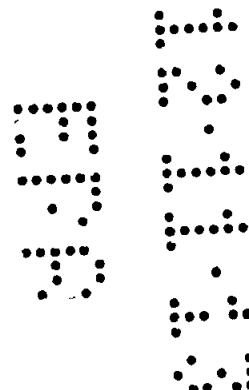
Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at [pay.gov.clev@clev.frb.org](mailto:pay.gov.clev@clev.frb.org).

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 25DFK2UU  
Agency Tracking ID: 74540780511  
Transaction Type: Sale  
Transaction Date: Dec 9, 2013 3:48:42 PM

Account Holder Name: Clarke Pugh  
Transaction Amount: \$18,893.00  
Billing Address: PO Box 121  
City: McGehee  
State/Province: AR  
Zip/Postal Code: 71654  
Country: USA  
Card Type: AmericanExpress  
Card Number: \*\*\*\*\*7008

Decision Number:  
Registration Number: 85806-I  
Company Name: AgSaver II, LLC  
Company Number: 85806  
Action Code: R334

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 12/11/13

Experts In-Processing Signature: MP Date 12/16/13 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date

EPA Reg. Number: <u>85806-4</u>		EPA Receipt Date: <u>12/11/13</u>							
Items for Review			Yes	No	N/A*				
1	Application Form (EPA Form 8570-1) signed & complete including package type		X						
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)		X						
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <th>yes</th> <th>no</th> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no								
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)		X						
	Certificate and data matrix consistent		X						
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <th>yes</th> <th>no</th> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no								
	If applicable, is there a letter of Authorization for exclusive use only.								
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)				X				
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)		X						
5	a) Selective Method (Fee category experts use)	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <th>yes</th> <th>no</th> </tr> <tr> <td style="text-align: center;">X</td> <td></td> </tr> </table>	yes	no	X				
yes	no								
X									
	b) Cite-All (Fee category experts use)	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <th>yes</th> <th>no</th> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no								
	c) Applicant owns all data (Fee category experts use)	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <th>yes</th> <th>no</th> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no								
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)		X						
7	Is the data package consistent with PR Notice 86-5		X						
8	Notice of Filing included with petitions				X				

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments: Studies passed 11-3 review. Pass  
492733.

Technical and Impurities only, no inerts  
to review.

12/26/13 - An e-mail was sent to the registrant,  
regarding the cover letter, application,  
cert. form and data matrix, which had  
the Reg. as 85806-I. It should be 85806-U.

12/30/13 - Registrant was aware of the deficiency,  
and said it was ok for me to cross out the  
I and put a U. TO

\* See e-mail \*

\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

#### **Unapproved Inerts Identified on CSFs**

##### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

##### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

## Jackson, Tracy

---

**From:** Butz, Ph.D., Robert G. [rbutz@sandw.com]  
**Sent:** Monday, December 30, 2013 9:38 AM  
**To:** Jackson, Tracy  
**Subject:** RE: Application Deficiencies (85806-U)

Tracy, OK to cross out and correct. Thanks.

--Bob Butz

Robert G. Butz, Ph.D.  
Staff Scientist  
Sullivan and Worcester LLP  
1666 K Street, NW  
Washington, DC 20006

Phone: 202 775 1211  
Email: [rbutz@sandw.com](mailto:rbutz@sandw.com)

-----Original Message-----

**From:** Jackson, Tracy [<mailto:jackson.tracy@epa.gov>]  
**Sent:** Friday, December 27, 2013 9:34 AM  
**To:** Butz, Ph.D., Robert G.  
**Subject:** RE: Application Deficiencies (85806-U)

Hello Mr. Butz,

Should I cross out the I on all of the forms and put a U, or would you prefer to resend the forms with corrections?

Thank You  
Tracy Jackson

-----Original Message-----

**From:** Butz, Ph.D., Robert G. [<mailto:rbutz@sandw.com>]  
**Sent:** Friday, December 27, 2013 9:29 AM  
**To:** Jackson, Tracy  
**Subject:** RE: Application Deficiencies (85806-U)

Tracy,  
The -U is correct.  
Robert Butz

---

**From:** Jackson, Tracy [[jackson.tracy@epa.gov](mailto:jackson.tracy@epa.gov)]  
**Sent:** Thursday, December 26, 2013 8:40 AM  
**To:** Butz, Ph.D., Robert G.  
**Subject:** Application Deficiencies (85806-U)

Dear Mr. Butz,

I am contacting you regarding your submission in support of AgSaver Dicamba Technical (85806-U). The cover letter, application form, certification with respect to citation form and



data matrix form have 85806-I as the registration number, but it should be 85806-U. Please clarify.

Thank You

Tracy Jackson  
EPA Contractor  
703-308-7227  
2777 S. Crystal Drive  
Arlington, VA 22202

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Communications from our firm may contain or incorporate federal tax advice. Under US Internal Revenue Service (IRS) standards, we are required to inform you that only formal, written tax opinions meeting IRS requirements may be relied upon by taxpayers for the purpose of avoiding tax-related penalties. Accordingly, this communication is not intended or written to be used, and it cannot be used, for the purpose of avoiding tax-related penalties under the Internal Revenue Code. Please contact a member of our law firm's Tax Department if you require a formal, written tax opinion that satisfies applicable IRS requirements, or if you have any other questions regarding federal tax advice.

## **Jackson, Tracy**

---

**From:** Jackson, Tracy  
**Sent:** Thursday, December 26, 2013 8:40 AM  
**To:** 'rbutz@sandw.com'  
**Subject:** Application Deficiencies (85806-U)

Dear Mr. Butz,

I am contacting you regarding your submission in support of **AgSaver Dicamba Technical (85806-U)**. The cover letter, application form, certification with respect to citation form and data matrix form have 85806-I as the registration number, but it should be 85806-U. Please clarify.

Thank You

Tracy Jackson  
EPA Contractor  
703-308-7227  
2777 S. Crystal Drive  
Arlington, VA 22202



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 13, 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-485797  
EPA File Symbol or Registration Number: 85806-U  
Product Name: DICAMBA TECHNICAL  
EPA Receipt Date: 11-Dec-2013  
EPA Company Number: 85806  
Company Name: AGSAVER II, LLC

ROBERT G. BUTZ  
SULLIVAN & WORCESTER LLP  
AGSAVER II, LLC  
1666 K STREET, NW  
WASHINGTON, DC 20006

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF  
THE ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL  
FORM;SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee  
Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "R. G. Butz", is written over the word "Sincerely,".

Front End Processing Staff  
Information Technology & Resources Management Division

**Fee for Service**

*W*  
{944846I~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

23

Receipt No.

S-

944846

EPA File Symbol/Reg. No.

85806-U

Pin-Punch Date:

12/11/2013

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R334

Granted:

R334

Amount Due: \$ 18,893. <sup>ff</sup>

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *[Signature]*

Date: 12-13-13

Remarks:

**21-Day Screen Completed by**  
**Contractor**

**21-Day Expires on** 1-1-14

**Jacket #** 85806-U  
**MRID#** 492733

**Content Screen:** Recommend to ☒ **Pass** / Fail

**11-3 Review:** ☒ **Pass** / Fail / NA

**Overall Status:** Recommend to ☒ **Pass** / Fail

**Transfer This Jacket to:**

STEPHEN JETTABE

	United States	<input checked="" type="checkbox"/>	Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/>	Amendment	
	Washington, DC 20460	<input type="checkbox"/>	Other	

**Application for Pesticide – Section I**

1. Company/Product Number EPA File Symbol: 85806-1 U 4. Company/Product (Name) AgSaver™ Dicamba Technical 5. Name and Address of Applicant (Include ZIP Code) AGSAVER II, LLC P. O. Box 111 MCGEEHEE, AR 71654 <input type="checkbox"/> Check if this is a new address	2. EPA Product Manager Kathryn Montague PM # 23 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. <b>42750-57</b> Product Name <b>ALBAUGH TECHNICAL DICAMBA ACID</b>
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**Section – II**

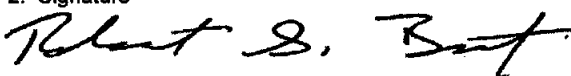
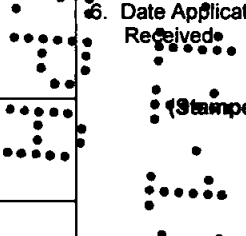
<input type="checkbox"/> Amendment – Explain below  <input type="checkbox"/> Resubmission in response to Agency letter dated  <input type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated  <input checked="" type="checkbox"/> "Me Too" Application  <input type="checkbox"/> Other – Explain below
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**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.) Application For Me Too dicamba acid technical product being registered for Terrestrial Food Crop; Terrestrial Nonfood Crop, and Terrestrial Noncrop uses for which US EPA has accepted required data and/or citations of data in support of registration; and uses for experimental purposes in compliance with US EPA. This action is PRIA Category R334  
**Point of Contact:** Robert Butz [rbutz@sandw.com](mailto:rbutz@sandw.com) 202-775-1211

**Section III**

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted If "Yes" Unit Packaging wgt.      No. per container      If "Yes" Package wgt.      No. per container			<input type="checkbox"/> Glass	Other (Specify) _____	
			<input type="checkbox"/> Paper		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

**Section IV**

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name <b>Robert G. Butz</b>	Title <b>Staff Scientist Sullivan &amp; Worchester LLP Authorized Agent for AgSaver, LLC</b>	Telephone No. (Include Area Code) <b>202-775-1211</b>	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law 2. Signature 		3. Title <b>Staff Scientist, Sullivan &amp; Worchester LLP Authorized Agent for AgSaver, LLC</b>  5. Date <b>December 11, 2013</b>	
4. Typed Name <b>Robert G. Butz</b>		6. Date Application Received 	

**\*Pages 136-139 Confidential Statement of Formula may be entitled to confidential treatment\***